

Policy and Procedure on

Child Protection and Safeguarding – children’s services

Lufton College

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Contents

8

1. Monitoring and review3

9

2. Terminology3

10

3. Definitions and age-related arrangements4

11

Multi agency working – Safeguarding Partners & Children’s Social Care4

12

Child protection definition5

13

Safeguarding definition – Working together to safeguarding children 20185

14

Safeguarding definition – Keeping Children Safe in Education 20225

15

Safeguarding Adults5

16

The difference between safeguarding and child protection6

17

Abuse and neglect – child and young person context6

18

4. Purpose6

19

5. Policy7

20

Safeguarding culture of the organisation7

21

Divisional Safeguarding Board8

22

What staff should read and be aware of8

23

Whole service approach to Safeguarding9

24

Children with special educational needs and disabilities or physical health issues9

25

Virtual school heads10

26

6. Procedure10

27

Roles and responsibilities10

28

Information sharing and managing the child protection file12

29

LADO referral criteria (KCSIE2022) – meeting the harm threshold13

30

Children potentially at greater risk of harm13

31

Unexplained body marks14

32

A disclosure from an Individual14

33

Risk Assessment16

34

Following a report - what to consider16

35

Options to manage the report17

36

Unsubstantiated, unfounded, false or malicious reports18

37

Safeguarding and supporting the victim18

38

Safeguarding and supporting the alleged perpetrator(s)18

39

Setting priorities19

40

Allegation of abuse by one or more Individuals on another Individual19

41

Allegation of abuse of an Individual who is not registered at our provision – staff involved19

42

Allegation of abuse of an Individual who is not registered at our provision- third party involved20

43	Allegations against staff.....	20
44	Allegations against staff in Education.....	20
45	Allegations against supply teachers and all workers supplied by agency.....	21
46	Allegations against the DSL (Principal or Registered Manager or DSL as a substantive role).....	21
47	Allegations against the Managing Director	22
48	Allegations against any other Senior Leader	22
49	Allegations against the Executive Head of Children’s Services	23
50	Allegations against the Chief Executive Officer	23
51	Allegations - The initial response.....	23
52	No Further Action	24
53	Further enquiries.....	24
54	Suspension	25
55	Supporting those involved.....	25
56	Allegation outcomes.....	25
57	Serious incident reporting	26
58	Death of someone in our care including rapid response to unexpected death.....	26
59	Abuse of position of trust	26
60	Volunteers.....	27
61	Contractors	27
62	Use of school or college premises for non-school/college activities	27
63	Extended school and off-site arrangements	27
64	Use of mobile phones	27
65	Photography and images	27
66	Physical intervention and use of reasonable force	28
67	Staff Taking Medication or other substances	28
68	Information for individuals and relatives/carers	28
69	Recruitment and vetting	28
70	Requirements to inform Disclosure and Barring Services (DBS).....	29
71	Record keeping.....	29
72	Monitoring.....	30
73	Training	30
74	Confidentiality and information sharing	30
75	Complaints and Monitoring	32
76	7. Accountability.....	32
77	8. Further Safeguarding information – what everyone needs to know (Appendix 12).....	33
78	9. Appendices	33
79	Appendix 1: Relevant policies and documents.....	33
80	Appendix 2: Legislation and guidance.....	35
81	Appendix 3: Child Protection and safeguarding procedure (Flow chart)	36
82	Appendix 4: Types of abuse – children	37
83	Appendix 5: Types of abuse - adults.....	38
84	Appendix 6: Signs that someone could be a victim.....	40
85	Appendix 7: Signs that someone could be an abuser.....	42
86	Appendix 8: DSL/DSL Officers, Head of College (if the concern/allegation is related to staff) – actions, reporting and recording procedure	43
87	Appendix 9: Key contacts.....	45
88	Appendix 10. Safeguarding in children’s Services - illustration	46
89	Appendix 11. Low – level concerns (Education).....	47
90	Appendix 12. Further Safeguarding information – what everyone needs to know	50
91		
92		
93		
94		
95		
96		
97		
98		
99		
100		

1. Monitoring and review

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

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

Signed:



Jeremy Wiles
Group Executive Director – Children’s Services
Date: September 2022



Sophia Cursons
Head of College
October 2022

2. Terminology

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

Establishment or Location	This is a generic term, which means the Children’s Home/school/college.
Individual	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Lufton College we have Children & young people (students) residing at and/or attending our college. Between the ages of 16 and 22 years.
Head of College	This is the senior person with overall responsibility for the college. At Lufton College this is the Head of College, Sophia Cursons.
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	Means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	This means the worker allocated to the individual’s family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Safeguarding Authority	Children’s Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] - England
LADO	Local Authority Designated Officer
DSL/DSL Officer	Designated Safeguarding Lead/Designated Safeguarding Officers
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
CambianKPI	The online in-house information system, which holds data for each site on quality measures.

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 (2022) now applies to providers of post 16 education as set out in Education and Training (Welfare of Children) Act 2021.
- 3.2. **Adults are over the age of 18.** Over 18-year olds are covered by the Local Safeguarding Adult Boards (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect; and as a result of their particular care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect'. We refer to adult service users in our provision as **young adults** due to the fact we provide children's services up to the age of 25.
- 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the legal framework for social service provision in Wales. It sets out what must and should be done to safeguard children and adults. At a local level regional safeguarding children's boards co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children.
- 3.4. Staff working with young adults aged 18 and over, who receive education, care and support from our children's services division will follow the Adult safeguarding referral process to LSAB/MASH/Regional Safeguarding Children's Boards depending on local arrangements.
- 3.5. This policy addresses children and young people up to the age of 18 and those over the age of 18 who attend a day or residential school or college – this might be 38 or 52 week provision. Some children attending school or college live in children's homes or care homes across England and Wales, hence the reason why this policy and procedure is more comprehensive than that of a traditional day school or college. Our safeguarding responsibility extends beyond day education and often covers 24hrs services regulated by various regulators across the UK.
- 3.6. Where we make references to schools and colleges, this also includes associated children's or care homes in which children/young people live. Where we make references to children's or care homes, those cover all children's/care homes including those within the children's residential care division.

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

- 3.7. Children Social Care - provide support to children in need of help and protection, including children with disabilities. Services include statutory assessment and care planning for children at risk of significant harm, provision for cared for children and care experienced young people, as well as fostering and adoption services.
- 3.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governance boards and proprietor should ensure that the school or college contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).
- 3.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area within the local authority and the chief officer of police for an area (any part of which falls) within the local authority work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- 3.10. It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governance boards, proprietor and their senior leadership teams, especially their DSLs, should make themselves aware of and follow their local arrangements.
- 3.11. The three safeguarding partners should allow all schools and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

16 Child protection definition

165 3.12. Child protection is part of the safeguarding process. It focuses on protecting individual children
166 identified as suffering or likely to suffer significant harm. This includes child protection procedures,
167 which detail how to respond to concerns about a child.

15 Safeguarding definition – Working together to safeguarding children 2018

169 3.13. **Safeguarding children and young people** is the action taken to promote the welfare of children and
170 protect them from harm. It means:

- 171 • Protecting children from abuse and maltreatment,
- 172 • Preventing harm to children's health or development,
- 173 • Ensuring children grow up with the provision of safe and effective care,
- 174 • Acting to enable all children and young people to have the best outcomes.

13 Safeguarding definition – Keeping Children Safe in Education 2022

176 3.14. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes
177 into contact with children and their families has a role to play. In order to fulfil this responsibility
178 effectively, all practitioners should make sure their approach is child-centred. This means that they
179 should consider, at all times, what is in the best interests of the child.

180 3.15. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 181 • Protecting children from maltreatment,
- 182 • Preventing impairment of children's mental and physical health or development,
- 183 • Ensuring that children grow up in circumstances consistent with the provision of
184 safe and effective care, and
- 185 • Acting to enable all children to have the best outcomes.

18 Safeguarding Adults

187 3.16. Safeguarding Adults means protecting an adult's right to live in safety, free from abuse and neglect.
188 It is about people and organisations working together to prevent and stop both the risks and experience of
189 abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where
190 appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

191 3.17. The statutory guidance enshrines the **six principles** of adults safeguarding:
192

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

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The difference between safeguarding and child protection

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

Abuse and neglect – child and young person context

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

3.20. Abuse could mean neglect, physical, emotional, 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 12 - Further safeguarding information – what everyone needs to know.**

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

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

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

4. Purpose

4.1. 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 Somerset Safeguarding board's locally agreed procedures. Printed or electronic copies of the Local Safeguarding Children's Partnerships (LSCP), Local Safeguarding Adults Board (LSAB) or Regional Safeguarding Children's Boards (Wales) procedures are available in every setting.

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

4.4. This policy, and supporting information in various accessible forms, is made available to all Individuals, staff and parents associated with Lufton College 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.

253 4.7. 'When to call the police' has been produced by the National Police Chiefs Council (NPCC) to support
254 school and college staff with when it is appropriate to contact the police.

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

258 5. Policy

259 Safeguarding culture of the organisation

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

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

273 5.2. Child Protection and Safeguarding is everyone's responsibility. Everyone working for or visiting our
274 locations has a responsibility to understand and implement this policy and procedure at all times.

275 5.3. All Individuals in our services have a right to feel safe, secure and be protected from harm.

276 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all
277 Individuals with Special Educational Needs (SEN) and disabilities:

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

285 5.5. The most common reason for children or young people being looked after is as a result of
286 abuse/neglect. We will ensure all staff have the skills, knowledge and understanding to help keep
287 children and young people safe.

288 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion
289 or disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care
290 home or in the community, taking into account contextual safeguarding, see **Appendix 12 - Further**
291 **safeguarding information – what everyone need to know** which also contains information related to
292 safeguarding issues related to individual children and young people's needs.

293 5.7. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding
294 of safeguarding, through both formal curriculum and informal opportunities.

295 5.8. As an organisation, we acknowledge that working in partnership with other agencies protects
 296 Individuals and reduces risk and so we will engage in partnership, working throughout the child
 297 protection process to safeguard children and will equally work through safeguarding adults'
 298 procedures as directed by local procedures.

299 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance
 300 referred to in this document can be found in separate appendices at the end of this document.

301 Divisional Safeguarding Board

302 5.10. As an organisation Caretech children's services operates three Divisional Safeguarding Boards:
 303 Education, Residential Care and Fostering. The main purpose of each board is to ensure that all
 304 services across all divisions discharge their responsibilities effectively for assuring safe and secure
 305 services for children and young people, and manage all safeguarding risks appropriately within its
 306 own workforce, including direct employees and also the contracted workforce (supply
 307 workers/agency/contractor and subcontractors). The full terms of reference for each Board is available
 308 on [Cambian Point](#).

309 What staff should read and be aware of

310 5.11. On the 1st September 2022 KCSIE2022 guidance replaced Keeping Children Safe in Education 2021. It
 311 is essential that everybody working in a school or college understands their safeguarding
 312 responsibilities. Staff who work directly with children read at least [Part one](#) of this guidance.
 313 Governance Boards and proprietor (or those acting on their behalf) working with their senior leadership
 314 teams and especially their designated safeguarding lead, should ensure that those staff who do not
 315 work directly with children read either Part one or [Annex A](#) (a condensed version of Part one) of this
 316 guidance.

317 5.12. The guidance should be read alongside:

- 318 • statutory guidance - [Working Together to Safeguard Children](#)
- 319 • departmental advice - [What to do if you are Worried a Child is Being Abused -](#)
 320 [Advice for Practitioners](#) ;

321 5.13. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan
 322 how the learning from KCSIE2022 will take place with their staff. School/college's SLT should ensure
 323 that staff complete KCSIE2022 knowledge check on Myrus.

324 5.14. All staff should be aware of systems within their school or college, which support safeguarding, and
 325 these should be explained to them as part of staff induction. This should include the:
 326 - Child protection and safeguarding policy
 327 - Behaviour Support policy
 328 - Anti bullying policy
 329 - Whistleblowing policy, Code of conduct and Code of Practice policy
 330 - Missing from Care policy, local procedure for children missing from education
 331 - Role of the DSL (including the identity of the DSL and any deputies)
 332 - Have Access to policies and a copy of Part one of KCSIE2022
 333 - All staff should be aware of their local early help process and understand their role in it, more
 334 information can be found in [Working Together to Safeguard Children 2018](#)
 335 [\(publishing.service.gov.uk\)](#).

336 5.15. All staff should be aware of the process for making referrals to children's social care and for statutory
 337 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a
 338 child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they
 339 might be expected to play in such assessments.

- 340 5.16. Schools concerned about a child's/young person's welfare should refer their concern to local authority
341 children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a
342 referral to children's social care (and if appropriate the police) is made immediately. Referrals should
343 follow the local referral process. Children's homes/care homes should follow their referral process as
344 per their local procedure and contact Safeguarding Partner/Safeguarding Board as per their local
345 Safeguarding procedure.
- 346 5.17. All staff should know what to do if a child/young person/young adult tells them he/she is being
347 abused, exploited or neglected. Staff should know how to manage the requirement to maintain an
348 appropriate level of confidentiality. This means only involving those who need to be involved, such as
349 the DSL (or an officer) and children's social care. Staff should never promise a child that they would not
350 tell anyone about a report of any form of abuse, as this might ultimately not be in the best interests of
351 the child.
- 352 5.18. All staff should be able to reassure victims that they are being taken seriously and that they will be
353 supported and kept safe. A victim should never be given the impression that they are creating a
354 problem by reporting any form of abuse including sexual violence and sexual harassment. Nor should
355 a victim ever be made to feel ashamed for making a report.
- 356 5.19. It is important to explain that the law is in place to protect children and young people rather than
357 criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- 358 5.20. All staff should be aware that children may not feel ready or know how to tell someone that they are
359 being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
360 For example, children may feel embarrassed, humiliated, or being threatened. This could be due to
361 their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent
362 staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
363 It is also important that staff determine how best to build trusted relationships with children and young
364 people which facilitate communication.
- 365 5.21. Staff should **not** assume a colleague, or another professional will act and share information that might
366 be critical in keeping children safe. They should be mindful that early information sharing is vital for the
367 effective identification, assessment, and allocation of appropriate service provision, whether this is
368 when problems first emerge, or where a child is already known to local authority children's social care
369 (such as a child in need or a child with a protection plan).

Whole service approach to Safeguarding

- 371 5.22. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school
372 or college approach to safeguarding. This means ensuring safeguarding and child protection are at
373 the forefront and underpin all relevant aspects of process and policy development. Ultimately, all
374 systems, processes and policies should operate with the best interests of the child at their heart.
- 375 5.23. Where there is a safeguarding concern, the child's wishes and feelings must be considered when
376 determining what action to take and what services to provide. Systems should be in place, and they
377 should be well promoted, easily understood and easily accessible for children to confidently report
378 abuse, knowing their concerns will be treated seriously, and knowing they can safely express their
379 views and give feedback.

Children with special educational needs and disabilities or physical health issues

- 381 5.24. Children with special educational needs or disabilities (SEND) or certain health conditions can face
382 additional safeguarding challenges. There might be some additional barriers when recognising abuse
383 and neglect in this group of children. These can include:
- 384 • assumptions that indicators of possible abuse such as behaviour, mood and injury relate
385 to the child's/young person's condition without further exploration;
 - 386 • these children/young people being more prone to peer group isolation or bullying
387 (including prejudice-based bullying) than other children/young people;

388 • the potential for children/young people with SEND or certain medical conditions being
389 disproportionally impacted by behaviours such as bullying, without outwardly showing
390 any signs; and

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

392 5.25. SEN division and other services where children have/may have SEND should consider extra pastoral
393 support and attention for these children, along with ensuring any appropriate support for
394 communication is in place. Further information can be found in the Department's: [SEND Code of](#)
395 [Practice 0 to 25 and Supporting Pupils at School with Medical Conditions](#).

396 Virtual school heads

397 5.26. Virtual school heads manage pupil premium plus for looked after children. In maintained schools and
398 academies, the designated teacher should work with the virtual school head to discuss how funding
399 can be best used to support the progress of looked after children in the school and meet the needs
400 identified in the child's personal education plan. The designated teacher should also work with the
401 virtual school head to promote the educational achievement of previously looked after children. In other
402 schools and colleges, an appropriately trained teacher should take the lead. More information can be
403 found in [Designated teacher for looked after and previously looked after children](#) and [Promoting the](#)
404 [education of looked after and previously looked after children](#).

405 6. Procedure

406 Roles and responsibilities

407 6.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and**
408 **visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and
409 abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

410 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-
411 contractors, partner organisations and visitors are aware of the policy and are supported to implement
412 and work in accordance with it, as well as creating a management culture that encourages a focus on
413 safeguarding. They must ensure that they are responsive, acting immediately if they become aware of
414 any safeguarding concerns, and supportive towards employees or volunteers who complain about
415 breaches in this policy.

416 6.3. The **DSL** is responsible for handling reports and/or concerns, about the protection of children, young
417 people and adults, appropriately and in accordance with the procedures that underpin this policy.
418
419

420 6.4. **Our DSL** is Sophia Cursons, Head of College & Registered Manager, who is a senior member of our
421 leadership team.



Name: Sophia Cursons
Contact: 07766 141296

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 and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child or adult) and where appropriate - Local Authority Designated Officer (LADO).
- Liaise with the head teacher or principal (if they are not the DSL themselves) to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the statutory guidance - [PACE Code C 2019](#).
- As required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.
- Act as a source of advice, support and expertise within the location when deciding to make a referral by liaising with relevant agencies.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced, with teachers and school and college leadership staff.
- Identify staff safeguarding training needs and organise training for their staff.
- Participate in local safeguarding boards when required.
- Evaluate and contribute to high standards of safeguarding practice at the location.
- Work to ensure that the wellbeing of children and young people is in constant focus and that they are guarded from harm or abuse.
- Ensure the child protection and safeguarding policy is available publicly and parents/those with parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school/college/home in this.
- Understands the relevant data protection legislation and regulations, especially The Data Protection Act 2018.

6.5. More details about the role of the DSL including their availability, management of referrals, information sharing, working with others, raising awareness and other can be found in [KCSIE 2022 Annex C – Role of the DSL](#).

- 6.6. **Designated Officer** – will act up in the absence of the DSL and compliment their ongoing work where asked do to so. There are arrangements for covering the role of the DSL when Sophia Cursons is unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team lead by a DSL with a number of Safeguarding Officers.

Our Safeguarding Officers are:

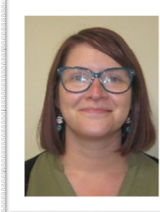
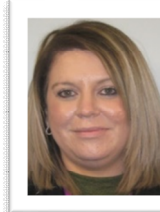

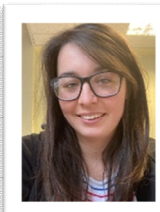
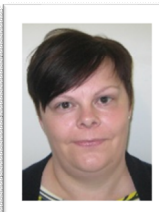
Hannah Hastilow - Head of Education

Jade Tillson – Deputy Head of Care

Emily Martina – Data Analyst

Hollie Earley – Occupational Therapist

Tracy Palmer – Administration Manager

				
Hannah Hastilow 07748 788627	Jade Tillson 07525 632977	Emily Martina 01935 403129	Hollie Earley 07860 189847	Tracy Palmer 01935 403126

- 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. Lufton College uses Databridge to log Safeguarding Concerns and record progress on these 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 Databridge – Concern/Safeguarding log 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. Lufton College use the Databridge system - Concern/Safeguarding log 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

503 6.12. They should ensure the file is only accessed by those who need to see it and where the file or content
504 within it is shared, this happens in line with information sharing advice as set out in KCSIE2022 and
505 [Information sharing advice for safeguarding practitioners](#).

506 6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for**
507 **each pupil or student**. This goes beyond the legal minimum. It is good practice to give the school or
508 college additional options to contact a responsible adult when a child missing education is also
509 identified as a welfare and/or safeguarding concern.

510 **LADO referral criteria (KCSIE2022) – meeting the harm threshold**

511 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if
512 they continue to work in regular or close contact with children in their present position, or in any capacity
513 with children in a school or college. This guidance should be followed where it is alleged that anyone
514 working in the school or college that provides education for children under 18 years of age, including
515 supply teachers, volunteers and contractors has:

- 516 • behaved in a way that has harmed a child, or may have harmed a child, and/or,
- 517 • possibly committed a criminal offence against or related to a child, and/or,
- 518 • behaved towards a child or children in a way that indicates he or she may pose a risk
519 of harm to children; and/or,
- 520 • behaved or may have behaved in a way that indicates they may not be suitable to work
521 with children

522 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of](#)
523 [the Children Act 1989 as amended by the Adoption and Children Act 2002](#).

524 6.16. The last bullet point above includes behaviour that may have happened outside of school or college
525 that might make an individual unsuitable to work with children; this is known as transferable risk.
526 Where appropriate an assessment of transferable risk to children with whom the person works should
527 be undertaken. If in doubt, seek advice from the local authority designated officer (LADO).

528 6.17. This above information relates to members of staff, supply staff and volunteers who are currently
529 working in any school or college regardless of whether the school or college is where the alleged abuse
530 took place. Allegations against a teacher who is no longer teaching should be referred to the police.
531 Historical allegations of abuse should also be referred to the police.

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

533 6.18. Many children and young people in our services (Education and care) organisation have an allocated
534 social worker due to safeguarding or welfare needs.

535 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's
536 experiences of adversity and trauma can leave them vulnerable to further harm, as well as
537 educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

538 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use
539 this information so that decisions can be made in the best interests of the child's safety, welfare and
540 educational outcomes. This should be considered as a matter of routine. There are clear powers to
541 share this information under existing duties on both local authorities and schools and colleges to
542 safeguard and promote the welfare of children.

543 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example,
544 responding to unauthorised absence or missing education where there are known safeguarding risks)
545 and about promoting welfare (for example, considering the provision of pastoral and/or academic
546 support, alongside action by statutory services). Schools/colleges must follow missing from education
547 protocol agreed with their LA.

548 6.22. Children missing from education, particularly persistently, can act as a vital warning sign to a range of
549 safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county
550 lines. It is important the school or college's response to children missing from education supports
551 identifying such abuse and helps prevent the risk of them going missing in the future. More information
552 can be found in [para 174 of KCSIE2022](#).

550 **Unexplained body marks**

554 6.23. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,
555 swellings, cuts and scratches which by and large will be as a result of daily activities or for some
556 Individuals as a result of self-injurious behaviour. However, all marks or physical changes must be
557 recorded appropriately using (number to be added) weekly body chart. A Concern form must be
558 completed for all unexplained marks and physical changes and passed to the DSL (or an officer) along
559 with copies of the last 3 days of Daily Diary notes and Activity Records. Parents/carers and social
560 workers should always be kept informed. Concern log should be updated with concern and relevant
561 reference number provided to concern.

562 6.24. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the
563 correct course of action for dealing with unexplained body marks.

564 6.25. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if
565 no reasonable explanation can be given the DSL must contact the Safeguarding Authority/LADO for
566 further advice and mutual conclusion as to whether the matter should be treated as a Safeguarding
567 Concern.

568 6.26. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be
569 opened and safeguarding process followed.

570 6.27. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome
571 must be shared with social worker and parents.

570 **Disclosure from an Individual**

573 6.28. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
574 **procedure.**

575 6.29. It is important to note that children/young people may not find it easy to tell staff about their abuse
576 verbally. Children/young people can show signs or act in ways that they hope adults will notice and
577 react to. In some cases, the victim may not make a direct report. For example, a friend may make a
578 report or a member of school or college staff may overhear a conversation that suggests a child has
579 been harmed or a child's/young person's own behaviour might indicate that something is wrong. If
580 staff have any concerns about a child's/young person's welfare, they should act on them immediately
581 rather than wait to be told and follow the procedure described in **Appendix 3. Child Protection and**
582 **safeguarding procedure.**

583 6.30. In case of reports of sexual violence and sexual harassment between children and young people, these
584 are extremely complex to manage. It is essential that victims are protected, offered appropriate support
585 and every effort is made to ensure their education and care is not disrupted . It is also important that
586 other children, young people and staff are supported and protected as appropriate.

587 6.31. The service's initial response to a report from a child/young person is incredibly important. How the
588 staff respond to a report can encourage or undermine the confidence of future victims of sexual
589 violence and sexual harassment to report or come forward.

590 6.32. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.
591 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage
592 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding
593 Authority) to discuss next steps. Staff should only share the report with those people who are necessary
594 in order to progress it. It is important that the victim understands what the next steps will be and whom
595 the report will be passed to.

- 596 6.33. **Reflect back**, using the child/young person's preferred communication method, being non-judgmental,
597 being clear about boundaries and how the report will be progressed, don't ask leading questions and
598 only prompt the child where necessary with open questions – where, when, what, etc. It is important
599 to note that whilst leading questions should be avoided, staff can ask children if they have been
600 harmed and what the nature of that harm was.
- 601 6.34. **Recognise** that a child/young person is likely to disclose to someone they trust: this could be anyone
602 on the school or college staff. It is important that the person to whom the child/young person discloses
603 recognises that the child/young person has placed them in a position of trust. They should be
604 supportive and respectful of the child/young person.
- 605 6.35. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the
606 report and immediately write up a thorough summary. This allows the staff member to devote their full
607 attention to the child/young person and to listen to what they are saying. It may be appropriate to
608 make notes during the report (especially if a second member of staff is present). However, if making
609 notes, staff should be conscious of the need to remain engaged with the child/young person and not
610 appear distracted by the note taking. Either way, it is essential a written record is made using Concern
611 form which is part of this policy. The written record must be fully completed within maximum of 24
612 hours of the disclosure, but verbal report to the DSL must be completed within an hour from the moment
613 of the disclosure being made.
- 614 6.36. Only recording the facts as the child/young person presents them. The notes should not reflect the
615 personal opinion of the note taker. Staff should be aware that notes of such reports could become part
616 of a statutory assessment by Safeguarding Authority and/or part of a criminal investigation.
- 617 6.37. In cases where either a child/young person informs the staff that an act of FGM – however described
618 – has been carried out on her, or where the staff observes physical signs on a girl appearing to show
619 that an act of FGM has been carried out these situations, the DSL must be informed, who will trigger
620 child protection/safeguarding procedures described in this policy and contact the Police. If a
621 child/young person is at immediate risk – the Police (999) must be contacted immediately. If a
622 child/young person required medical attention, follow steps identified in 'Setting priorities' section
623 below.
- 624 6.38. Remember, **do not**:
- 625 • Investigate the incident
 - 626 • Ask leading questions
 - 627 • Get the young person to repeat the disclosure over and over
 - 628 • Make assumptions or offer alternative explanations
 - 629 • Approach/inform the alleged abuser
- 630 6.39. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Officer – actions, reporting**
631 **and recording procedure.**
- 632 6.40. All staff know that they can contact the Local Authority direct should that be necessary. Where a
633 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local
634 Safeguarding Adult Board. Where someone is over 18 but still receiving children's services, the matter
635 should be dealt with by the local Safeguarding Adult Board.
- 636 6.41. For allegation made against a staff member or senior managers/directors follow relevant allegations
637 procedures described later on in this policy.
- 638 6.42. Where contact is made with the Local Authority in which Lufton College is geographically located,
639 contact will also be made with the individual's own Local Authority and also the child/young person's
640 social worker. This will be completed by one of the members of the college's safeguarding team.
- 641 6.43. In the case of serious harm, and/or the Individual is in immediate danger the local Police should be
642 informed immediately and they can take immediate protective action as necessary.

643 6.44. If a member of staff feels their concerns are not being taken seriously then they are to inform a more
644 senior manager, a Director of the Company or contact Ofsted/CQC, the local safeguarding boards, the
645 police or the **Whistleblowing Hotline – on 0800 086 9128**.

646 Risk Assessment

647 6.45. When there has been a report of sexual violence, the DSL (or an officer) should make an immediate
648 risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk
649 assessment should be considered on a case-by-case basis. The risk and needs assessment should
650 consider:

- 651 • the victim, especially their protection and support,
- 652 • whether there may have been other victims,
- 653 • the alleged perpetrator(s); and
- 654 • all the other children, (and, if appropriate, adult students and staff) at the school or
655 college especially, and any actions that are appropriate to protect them from the alleged
656 perpetrator(s), or from future harms.
- 657 • The time and location of the incident, and any action required to make the location safer.

658 6.46. Risk assessments should be recorded (written or electronic) and should be kept under review. At all
659 times, staff should be actively considering the risks posed to all their pupils and students and put
660 adequate measures in place to protect them and keep them safe. The DSL (or an officer) should ensure
661 they are engaging with the local Safeguarding Authority and specialist services as required. Where
662 there has been a report of sexual violence, it is likely that professional risk assessments by social
663 workers and or sexual violence specialists will be required. The above school or college risk
664 assessment is not intended to replace the detailed assessments of expert professionals. Any such
665 professional assessments should be used to inform the school's or college's approach to supporting
666 and protecting their pupils and students and updating their own risk assessment.

667 Following a report - what to consider

668 6.47. Important considerations will include:

- 669 • the wishes of the victim in terms of how they want to proceed. This is especially important in
670 the context of sexual violence and sexual harassment. Victims should be given as much
671 control as is reasonably possible over decisions regarding how any investigation will be
672 progressed and any support that they will be offered. This will however need to be balanced
673 with the school's or college's duty and responsibilities to protect other children/young people;
- 674 • the nature of the alleged incident(s), including whether a crime may have been
675 committed and/or whether HSB has been displayed;
- 676 • the ages of the children/young people involved;
- 677 • the developmental stages of the children/young people involved;
- 678 • any power imbalance between the children/young people. For example, is the alleged
679 perpetrator(s) significantly older, more mature or more confident? Does the victim have
680 a disability or learning difficulty?
- 681 • if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be
682 accompanied by other forms of abuse and a sustained pattern may not just be of a
683 sexual nature);
- 684 • that sexual violence and sexual harassment can take place within intimate personal
685 relationships between children/young people/adults;

- 686 • importance of understanding intra familial harms and any necessary support for siblings
687 following incidents
- 688 • are there ongoing risks to the victim, other children, adult students or school or college
689 staff; and
- 690 • other related issues and wider context, including any links to child sexual exploitation
691 and child criminal exploitation.

692 6.48. As always when concerned about the welfare of a child, all staff should act in the best interests of the
693 child/young person. In all cases, schools and colleges should follow general safeguarding principles
694 as set out throughout this guidance. Immediate consideration should be given as to how best to
695 support and protect the victim and the alleged perpetrator(s) (and any other children
696 involved/impacted).

697 Options to manage the report

698 6.49. It is important that schools and colleges consider every report on a case-by-case basis. When to inform
699 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going
700 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school or college
701 should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be
702 informed of the allegations. However, as per general safeguarding principles, this does not and should
703 not stop the school or college taking immediate action to safeguard their children, where required.

704 6.50. There are four likely scenarios for schools and colleges to consider when managing any reports of
705 sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and
706 actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is
707 particularly important to look out for potential patterns of concerning, problematic or inappropriate
708 behaviour. Where a pattern is identified, the school or college should decide on a course of action.
709 Consideration should be given as to whether there are wider cultural issues within the school or college
710 that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or
711 staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

- 712 • **Manage internally;** In some cases of sexual harassment, for example, one-off incidents,
713 the school or college may take the view that the children concerned are not in need of
714 early help or that referrals need to be made to statutory services and that it would be
715 appropriate to handle the incident internally, perhaps through utilising their behaviour
716 policy and by providing pastoral support.
- 717 • **Early help:** In line with the above, the school or college may decide that the
718 children/young person involved do not require referral to statutory services but may
719 benefit from early help. Early help means providing support as soon as a problem
720 emerges, at any point in a child's life. Providing early help is more effective in promoting
721 the welfare of children than reacting later. Early help can be particularly useful to address
722 non-violent HSB and may prevent escalation of sexual violence. It is particularly important
723 that the DSL (and their deputies) know what the Early Help process is and how and where
724 to access support.
- 725 • Schools and colleges, as relevant agencies, should be part of discussions with statutory
726 safeguarding partners to agree the levels for the different types of assessment and
727 services to be commissioned and delivered, as part of the local arrangements.
728 Safeguarding partners should publish a local threshold document which includes the
729 process for the local early help assessment and the type and level of early help services
730 to be provided, and DSLs (officers) will need to familiarise themselves with this document.
- 731 • **Referrals to Safeguarding Authority** - where a child has been harmed, is at risk of harm,
732 or is in immediate danger, schools and colleges should make a referral to the local
733 Safeguarding Authority. At the point of referral, schools and colleges will generally
734 inform parents or carers, unless there are compelling reasons not to (if informing a
735 parent or carer is going to put the child at additional risk). Any such decision should be
736 made with the support of children's social care.

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- **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 officers) are clear about the local process for referrals and follow that process.

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

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- 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child/young person and/or the person who has made the allegation needs 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.
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- 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.

748 **Safeguarding and supporting the victim**

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- 6.53. The needs and wishes of the victim should be paramount (along with protecting the child)/young person 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.
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- 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).
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- 759
- 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.
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- 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.
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- 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.
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- 6.58. Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.

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

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- 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 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):
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- The school or college will have a difficult balancing act to consider. On the one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

- 785 • Consider the age and the developmental stage of the alleged perpetrator(s), the nature
786 of the allegations and frequency of allegations. Any child will likely experience stress as
787 a result of being the subject of allegations and/or negative reactions by their peers to the
788 allegations against them.
- 789 • Consider the proportionality of the response. Support (and sanctions) should be
790 considered on a case-by-case basis. The alleged perpetrator(s) may potentially have
791 unmet needs (in some cases these may be considerable) as well as potentially posing a
792 risk of harm to other children. HSB in young children may be (and often are) a
793 symptom of either their own abuse or exposure to abusive practices and or materials.
- 794 • It is important that the perpetrator(s) is/are also given the correct support to try to stop
795 them re-offending and to address any underlying trauma that may be causing this
796 behaviour. Addressing inappropriate behaviour can be an important intervention that
797 helps prevent problematic, abusive and/or violent behaviour in the future.
- 798 • Advice on behaviour and discipline in schools is clear that teachers can discipline pupils
799 whose conduct falls below the standard, which could be reasonably expected of them.
800 If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.

801 **Setting priorities**

- 802 6.60. The priority, at all stages throughout the child protection or safeguarding process, is the interests and
803 safety of the individual.
- 804 6.61. 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 Lufton College 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 6.62. 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 6.63. 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
813 the 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
815 parents/carers as soon as possible.
- 816 6.64. If the suspected abuse is sexual, then the medical professional must determine if the medical
817 examination should be delayed until the Local Authority and the Police can liaise with the hospital.
818 There is a possibility that the needs of the young person are such that medical attention is the priority,
819 in such case medical professional's judgment must be followed. There must at all times be an
820 Appropriate adult (parent/guardian or a social worker) with the individual whether from the Individual's
821 care home/school/college, the Local Authority or the Police, if the parents/carers are not included. This
822 section must be read in conjunction with our **0.29. Child Sexual Exploitation policy**.
- 823 6.65. Cambian will provide an advocate to each Individual where appropriate, if they are unable to speak
824 for 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 6.66. 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 Individual on individual abuse including
830 child on child/young adult on young adult or between individuals of a different age or other to a
831 Safeguarding Authority, local Authority and Regulator.

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

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

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

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

Allegations against staff

- 6.69. All allegations must be reported to the DSL, Sophia Cursons or in their absence to one of the Safeguarding Officers – see your local Safeguarding poster. In addition, where appropriate – Sherri-Ann Fudge, HR Business Partner must be consulted.
- 6.70. When an allegation is made against a member of staff, set procedures must be followed, see the flow chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.
- 6.71. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully assessed and investigated. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.
- 6.72. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided for what to do in the event an allegation is made against them.

Allegations against staff in Education

- 6.73. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors. The allegations are split into two groups:
- Allegations that may meet the harm threshold (see **LADO referral criteria**) – **meeting the harm threshold** of this policy)
 - Allegation/concerns that do not meet the harms threshold – referred in the guidance and this policy as 'low - level concerns' - **Appendix 11. Low – level concerns (Education)**.
- 6.74. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college.

873 6.75. The information above relate to members of staff, supply staff, volunteers and contractors who are
874 currently working in any school or college regardless of whether the school or college is where the
875 alleged abuse took place. It is advised that in Education allegations against people listed above should
876 be referred to the Head of College who is often the DSL, however where the Head of College is not the
877 DSL, allegations against staff including supply, volunteers and contractors must be referred to the Head
878 of College who may liaise with the DSL. This is because the concern/allegation may align with other
879 performance or personal related issues the Head of College might already be aware of, whereas the
880 DSL may not be. The Head of College should ensure the DSL is briefed as appropriate and will then
881 decide whom the case should be led by – the DSL or themselves. Allegations against a teacher who is
882 no longer teaching should be referred **to the police** and HR Business Partner advised.

883 6.76. Where an adult makes an allegation to a school or college that they were abused as a child, the
884 individual should be advised to report the allegation to the police. Non-recent allegations made by a
885 child, should be reported to the LADO in line with the local authority's procedures for dealing with non-
886 recent allegations. The LADO will coordinate with children social care and the police. Abuse can be
887 reported no matter how long ago it happened.

888 6.77. Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher
889 because of serious misconduct, or might have dismissed them or ceased to use their services had they
890 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching
891 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be
892 found on GOV.UK.

893 **Allegations against supply teachers and all workers supplied by agency**

894 6.78. In some circumstances schools and colleges will have to consider an allegation against an individual
895 not directly employed by them, where its disciplinary procedures do not fully apply because agencies
896 will have their own policies and procedures; for example, supply teachers or contracted staff provided
897 by an employment agency or business.

898 6.79. Whilst the Organisation's schools and colleges are not the employer of supply teachers, they should
899 ensure allegations are dealt with properly. In no circumstances should a school or college decide to
900 cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising
901 with the LADO to determine a suitable outcome. Schools and colleges must also consult HR Business
902 Partner who may advise further. Governance boards and proprietors should discuss with the supply
903 agency or agencies where the supply teacher is working across a number of schools of colleges,
904 whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school
905 or college, whilst they carry out their investigation.

906 6.80. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or
907 children's social care. The school or college will usually take the lead because agencies do not have
908 direct access to children/young people or other school of college staff, so they will not be able to collect
909 the facts when an allegation is made, nor do they have all the relevant information required by the
910 LADO as part of the referral process.

911 6.81. When using a supply agency, schools and colleges should inform the agency of its process for
912 managing allegations but also take account of the agency's policies and investigatory process and
913 their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human
914 resource manager or equivalent to meetings and keeping them up to date with information about its
915 policies. It is important we not blur the lines of employment, so in case there is any confusion, HR
916 Business Partner should be consulted.

917 **Allegations against the DSL (Head of College or Registered Manager or DSL as a substantive role)**

919 6.82. All allegations must be reported to:

- 920 - Education division: Regional Education Lead Regional Education Lead - Simon Brown
- 921 and Regional Care Lead - Hayley Lukaszewski ,
- 922 - Managing Director for Education – Chris Strong.

- 923 6.83. The person who referred the matter to local Safeguarding Authority/LADO in line with agreed course
924 of action will decide about who will lead the case including management investigation – should the
925 allegation threshold be met. The appropriate HR Business Partner should be notified, so they can
926 advise and where required - support the investigation.
- 927 6.84. In residential education associated with children’s homes/care homes the Responsible/Nominated
928 Individual MUST also be notified.
- 929 6.85. Services using Databridge system – allegations made against the DSL who have full access to the
930 system including Concern/Safeguarding log, should not be initially entered to the system, but recoded
931 on the policy associated Concern form and Safeguarding Tracking Pack as they would have been prior
932 to implementation of the Databridge logging. This is to ensure that no one, including those who are
933 part of the service’s Safeguarding Team are able to see the details of their own case which could have
934 a detrimental impact on the investigation itself and the outcome of it. However, once the case has been
935 concluded, a decision should then be made about whether or not the detail related to the case should
936 be retrospectively entered in to Databridge or kept in the original format. Such a decision should be
937 made by the Case Manager, Managing Director and a member of HR Team. Should a decision be
938 made to keep it in the original format, a Concern/Safeguarding log in Databridge must still be
939 retrospectively opened and a note added to reflect that there was an allegation made against the DSL
940 but without specifying any further detail about the character of the allegation. Instead, a reference
941 number of the case and location of the pack related to the case is provided. This action will ensure that
942 the case has been captured in the system, which will then allow the service to generate a log with
943 accurate numbers of concerns and safeguarding cases for the service.

9 Allegations against the Regional Manager/other Regional staff

- 945 6.86. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Head of
946 College) who will make the initial referral to local Safeguarding Authority/LADO. Following this, the
947 allegation should be passed to the identified senior person to follow through with local Safeguarding
948 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will
949 retain the responsibility to report the initial concern, but will have no further part in the process
950 regarding gathering any information or, should it be required, in the actual investigation in relation to
951 a senior member.
- 952 6.87. Allegations not linked to specific site must be reported to Managing Director who will refer the matter
953 to local Safeguarding Authority/LADO and act in line with agreed course of action.
- 954 6.88. The appropriate HR Business Partner should be notified, so they can advise and where required -
955 support the investigation.

9 Allegations against the Managing Director

- 957 6.89. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Head of
958 College) who will make the initial referral to local Safeguarding Authority/LADO. Following this, the
959 allegation should be passed to the identified senior person to follow through with local Safeguarding
960 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will
961 retain the responsibility to report the initial concern, but will have no further part in the process
962 regarding gathering any information or, should it be required, in the actual investigation in relation to
963 a senior member.
- 964 6.90. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the
965 matter to local Safeguarding Authority/LADO and act in line with agreed course of action.
- 966 6.91. The Head of HR should be notified, so they can advise and where required - support the investigation.

967

9 Allegations against any other Senior Leader

969 6.92. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Head of
970 College) who will make the initial referral to local Safeguarding Authority/LADO Following this, the
971 allegation should be passed to the identified senior person to follow through with local Safeguarding
972 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will
973 retain the responsibility to report the initial concern, but will have no further part in the process
974 regarding gathering any information or, should it be required, in the actual investigation in relation to
975 a senior member.

976 6.93. Allegations not linked to specific site must be reported to the person's (whom allegation is made
977 against) line manager who will refer the matter to local Safeguarding Authority/LADO and act in line
978 with agreed course of action.

979 6.94. The Head of HR should be notified, so they can advise and where required - support the investigation.

980 Allegations against the Executive Head of Children's Services

981 6.95. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Head of
982 College) who will make the initial referral to local Safeguarding Authority/LADO. Following this, the
983 allegation should be passed to the identified senior person to follow through with local Safeguarding
984 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will
985 retain the responsibility to report the initial concern, but will have no further part in the process
986 regarding gathering any information or, should it be required, in the actual investigation in relation to
987 a senior member.

988 6.96. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
989 Amanda Sherlock who will refer the matter to local Safeguarding Authority/LADO and act in line with
990 agreed course of action.

991 6.97. The Head of HR should be notified, so they can advise and where required - support the investigation.

992 Allegations against the Chief Executive Officer

993 6.98. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Head of
994 College) who will make the initial referral to local Safeguarding Authority/LADO Following this, the
995 allegation should be passed to the identified senior person to follow through with local Safeguarding
996 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will
997 retain the responsibility to report the initial concern, but will have no further part in the process
998 regarding gathering any information or, should it be required, in the actual investigation in relation to
999 a senior member.

1000 6.99. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
1001 Amanda Sherlock who will refer the matter to local Safeguarding Authority/LADO and act in line with
1002 agreed course of action.

1003 6.100. The Head of HR should be notified, so they can advise and where required - support the investigation.

1004 Allegations - The initial response

1005 6.101. Where the school or college identifies a child/young person has been harmed, that there may be an
1006 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact
1007 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are
1008 two aspects to consider when an allegation is made:

1009 • **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child
1010 is not at risk and referring cases of suspected abuse to the local authority children's social
1011 care as described in Part one of this guidance.

1012 • **Investigating and supporting the person subject to the allegation** - the case manager
1013 should discuss with the LADO, the nature, content and context of the allegation, and
1014 agree a course of action.

1015 6.102. When dealing with allegations, schools and colleges should:

- 1016 • apply common sense and judgement
- 1017 • deal with allegations quickly, fairly and consistently; and
- 1018 • provide effective protection for the child and support the person subject to the allegation.

1019 6.103. Schools and colleges should ensure they understand the local authority arrangements for managing
 1020 allegations, including the contact details and what information the LADO will require when an
 1021 allegation is made. Before contacting the LADO, schools and colleges should conduct basic enquiries
 1022 in line with local procedures to establish the facts to help them determine whether there is any
 1023 foundation to the allegation, being careful not to jeopardise any future police investigation. For
 1024 example:

- 1025 • **was the individual in the school or college at the time of the allegations?**
- 1026 • **did the individual, or could they have, come into contact with the child?**
- 1027 • **are there any witnesses? and,**
- 1028 • **was there any CCTV footage?**

1029 6.104. These are just a sample of example questions. Services should be familiar with what initial information
 1030 the LADO will require. This information can be found in local policy and procedural guidance provided
 1031 by the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be
 1032 shared with the HR department to support any investigation.

1033 6.105. When to inform the individual of the allegation should be considered carefully on a case-by-case basis,
 1034 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1035 6.106. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion
 1036 involving the police and/or children's social care will be convened in accordance with the statutory
 1037 guidance [Working Together to Safeguard Children](#).

1038 6.107. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the
 1039 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next
 1040 steps with the case manager (A 'case manager' will be the person leading any investigation. This will be
 1041 either the DSL which is often the Head of College/Registered Manager or, where the case manager is
 1042 the subject of an allegation, it will be the Proprietor or a Director nominated by them). A LADO should
 1043 be informed who will lead investigation to ensure there is no conflict of interest or any other concerns
 1044 related to the choice of the case manager.

1045 **No Further Action**

1046 6.108. Where the initial discussion initial discussion leads to no further action, the case manager and the
 1047 LADO should:

- 1048 • record the decision and justification for it; and,
- 1049 • agree on what information should be put in writing to the individual concerned and by
 1050 whom.

1051 **Further enquiries**

1052 6.109. Where further enquiries are required to enable a decision about how to proceed, the LADO and case
 1053 manager should discuss how and by whom the investigation will be undertaken. In straightforward
 1054 cases, the investigation should normally be undertaken by a senior member of the school's or college's
 1055 staff.

1056 6.110. Where there is a lack of appropriate resource within the school or college, or the nature or complexity
 1057 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional
 1058 Manager (Education or Care), a Director, HR Business Partner or an independent investigator if
 1059 appropriate.

1060 6.111. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly
1061 as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly
1062 intervals, depending on the complexity of the case.

1063 6.112. Wherever possible, the first review should take place no later than four weeks after the initial
1064 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review
1065 meeting if the investigation continues. The LADO will provide advice and guidance to schools and
1066 colleges when considering allegations against adults working with children. The LADO's role is not to
1067 investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that
1068 is by the police, children's social care, the school or college, or a combination of these.

1059 Suspension

1070 6.113. Suspension should not be an automatic response when an allegation is reported. All options to avoid
1071 suspension should be considered prior to taking that step. The case manager must consider carefully
1072 whether the circumstances warrant suspension from contact with children/young people at the school
1073 or college, or until the allegation is resolved. It should be considered only in cases where there is cause
1074 to suspect a child or other children at the school or college is/are at risk of harm, or the allegation could
1075 be considered as gross or serious misconduct. Prior to any suspension, the case manager must consult
1076 with their HR Business Partner and the LADO, as well as the police and the local Safeguarding Authority
1077 where they have been involved. More information on suspension and associated process can be found
1078 in Part 4 of KCSIE2022/Suspension.

1080 Supporting those involved

1080 6.114. The welfare of a child/young person is paramount and this will be the prime concern in terms of
1081 investigating an allegation against a person in a position of trust. However, when an allegation or
1082 safeguarding concern is being investigated it is likely to be a very stressful experience for the adult
1083 subject of the investigation, and potentially for the family members. It is important that an employer
1084 offers appropriate welfare support at such a time and recognises the sensitivity of the situation.
1085 Information is confidential and should not ordinarily be shared with the other staff or with children or
1086 parents who are not directly involved in the investigation. More about employer's duty of care to their
1087 employees can be found in the KCSIE2022 guidance.

1088 6.115. Staff whom allegation/s have been made against must always be supported and if suspended they
1089 will receive a support person (nominated contact), any suspension is not an indication of guilt.

1090 Allegation outcomes

1091 6.116. The definitions that should be used when schools and colleges determine the outcome of an allegation
1092 are set out below:

- 1093 • Substantiated: there is sufficient evidence to prove the allegation;
- 1094 • Malicious: there is sufficient evidence to disprove the allegation and there has been a
1095 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1096 • False: there is sufficient evidence to disprove the allegation;
- 1097 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.
1098 The term, therefore, does not imply guilt or innocence; or
- 1099 • Unfounded: to reflect cases where there is no evidence or proper basis which supports
1100 the allegation being made.

1101 6.117. It should be noted that these definitions are available to support the decision-making process.
1102 However, in certain cases, in the absence of any substantiating evidence, the Company may still
1103 progress through the formal disciplinary procedure if there are reasonable grounds to do so, or there
1104 is a reasonable belief that an employee has committed an act of misconduct.

1105 6.118. Ultimately, the options open to the school or college depend on the nature and circumstances of the
1106 allegations and the evidence and information available. This will range from taking no further action,
1107 to dismissal or a decision not to use the person's services in future.

1108 Serious incident reporting

1109 6.119. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported
1110 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

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

1112 6.120. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
1113 rapid response, process described below:

- 1114 • Call the Ambulance and Police
- 1115 • Unless the 999 operator tells you to, do not touch the person; do not move anything
- 1116 around them, which may form part of forensic evidence. Police will decide about the
- 1117 forensic examinations and appropriate security of the scene.
- 1118 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI)
- 1119 reporting procedure. The DSL will contact the Managing Director of the division they work
- 1120 in and verbally inform them of what happened before completing SUI Part 2.
- 1121 • DSL will contact Children's/Adults Social Care Team
- 1122 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health
- 1123 Services (CAMHS) should also be notified by the Safeguarding Authority.

1124 6.121. Once the above rapid steps have been taken, further steps described below must be followed.

1125 6.122. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the
1126 following within 24 hours:

- 1127 • Chief Operating Officer, Managing Director, Responsible/Nominated Individual,
- 1128 Regional Manager following the **35.01. Caretech Children's services SUI process.**
- 1129 • Next of kin/parents/carer of the deceased.
- 1130 • Where the death of an individual occurs in an education location the assistance of the
- 1131 local police and social services department should be sought in informing the
- 1132 parents/guardians.
- 1133 • The appropriate regulatory body: e.g. Ofsted, CQC
- 1134 • Ministry of justice if applicable.
- 1135 • The placing authority/authorities.
- 1136 • The local authority responsible for Social Services and Education (where the death takes
- 1137 place in a registered school) within whose area the education location is situated.
- 1138 • The District Health Authority within whose area the education location is situated.
- 1139 • The Department for Education, (where the death takes place in a registered school).
- 1140 • The Health and Safety Executive.

1141 Abuse of position of trust

1147 6.123. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,
1148 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the
1149 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a
1150 position of trust, even if the relationship is consensual. This means that any sexual activity between a
1151 member of the staff and a young person under 18 may be a criminal offence, even if that young person
1152 is over the age of consent.

1153 Visitors

1154 6.124. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all
1155 times. All unauthorised visitors will be challenged by staff and reported to the home manager/Head of
1156 College before entry is authorised.

1157 Volunteers

1158 6.125. Volunteers undergo checks commensurate with their work in the home/school/college and contact
1159 with children, young people and adults i.e. if they are in regulated activity or not.

1160 Contractors

1161 6.126. We will check the identity of all contractors working on site and requests the full range of DBS and other
1162 required checks where they work in regulated activity or unsupervised in accordance with the latest
1163 government guidance.

1164 Use of school or college premises for non-school/college activities

1165 6.127. Where governance boards or proprietor hire or rent out school or college facilities/premises to
1166 organisations or individuals (for example to community groups, sports associations, and service
1167 providers to run community or extra-curricular activities) they should ensure that appropriate
1168 arrangements are in place to keep children safe.

1169 Extended school and off-site arrangements

1170 6.128. Where extended off-site activities are provided by and managed by us, our safeguarding policy and
1171 procedures apply. If other organisations provide services or activities on our site we will check that they
1172 have appropriate policies and procedures in place, including safer recruitment procedures and clarify
1173 whose procedure is to be followed if there are concerns. There will be clear communication channels
1174 to ensure the DSL is kept appropriately informed.

1175 6.129. When our Individuals are doing off-site activities, including day and residential visits and work related
1176 activities, we will risk assess and check that effective safeguarding arrangements are in place. The
1177 DSL will be kept appropriately informed.

1178 Use of mobile phones

1179 6.130. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media
1180 access including **Pro 01. Mobile Telephony Policy** at all times.

1181 6.131. All computer equipment and internet access within the home/school/college is subject to 'parental
1182 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social
1183 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons
1184 during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting
1185 the many learning and social opportunities available through the internet and social media.

1186 6.132. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST
1187 neither mention Lufton College or refer to their employment at the college. Staff are advised not to
1188 communicate with parents, guardians, carers or Individuals via social networking sites

1189

1190

1191 Photography and images

1192 6.133. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1193 6.134. The vast majority of people who take or view photographs or videos of Individuals do so for entirely
1194 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people
1195 through taking or using images, so we have some safeguards in place.

1196 6.135. To protect our children, young people or young adults we will:

- 1197 • seek their consent for photographs to be taken or published (for example, on our
1198 website or in newspapers or publications)
- 1199 • seek parental consent of consent from the Individual
- 1200 • not use their full name with an image, only their initials
- 1201 • ensure that personal data is not shared
- 1202 • store images appropriately, securely and for no longer than necessary
- 1203 • only use school equipment, i.e. not personal devices
- 1204 • encourage our children, young people and adults to tell us if they are worried about any
1205 photographs that are taken of them

1206 **Physical intervention and use of reasonable force**

1207 6.136. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are
1208 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**
1209 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,
1210 recorded and monitored within the 3 weekly MDT meetings and during Safeguarding meetings.

1211 **Staff Taking Medication or other substances**

1212 6.137. Staff members must not be under the influence of alcohol or any other substance, which may affect
1213 their ability to care for the Individuals. If they are taking medication, they should seek medical advice
1214 and inform the Home Manager/Head of College who will review the medical advice and take a
1215 decision as to whether they are fit for work.

1216 6.138. We only allow staff to work if medical advice confirms that their ability to look after Individuals is unlikely
1217 to be impaired. Should a member of staff need to bring their medication to the home/school/college,
1218 it must be securely stored and out of reach of all children, young people and young adults. This section
1219 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

1220 **Information for individuals and relatives/carers**

1221 6.139. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be
1222 dealt with independently and that they will be kept involved in the process to the degree that they wish
1223 to be. They will be reassured that they will receive help and support in taking action.

1224 6.140. They will also be advised that they can nominate an advocate or representative to speak and act on
1225 their behalf if they wish. For individuals assessed as lacking capacity to make decisions about how
1226 they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and
1227 may be appointed. They will be advised of rights to legal aid in where appropriate to victim support
1228 and compensation.

1229 **Recruitment and vetting**

1230 6.141. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**
1231 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct
1232 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting
1233 schools should read Part 3 of KCSIE2022 guidance dedicated to Safer Recruitment.

1234 6.142. Each Education location maintains a **Single Central Record (SCR)**. This covers all staff including supply
1235 teaching and teacher trainees, agency care staff as well as multisite managers and members of the
1236 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1237 6.143. For agency workers we obtain written confirmation that all checks have been completed, in line with
1238 safer recruitment from the employment business that is supplying the member of agency staff. All
1239 Locations must ensure that an agreement exists between the Location and the agency to confirm that,
1240 in the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate
1241 before that person can begin work at the college.

1242 6.144. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the
1243 agency.

1244 6.145. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to
1245 the same recruitment regulations and procedures as the education staff.

12 Requirements to Inform Disclosure and Barring Services (DBS)

1247 6.146. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on
1248 the barred lists is required.

1249 6.147. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one
1250 month after leaving the Location) if a person in regulated activity has been dismissed or removed due
1251 to safeguarding concerns, or would have been had they not resigned.

1252 6.148. In the case of a member of teaching staff at a school or sixth form college, the case manager must
1253 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

1254 6.149. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,
1255 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she
1256 is considered unsuitable to work with children and young people.

1257 6.150. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is
1258 provided at paragraph 179.

1259 6.151. All Managers must read the Group leavers policy – all referrals must be recorded with HR so they can
1260 ensure any future references are correct. The references team log referrals so this can be completed.
1261 This will apply to both: DBS and TRA.

12 Record keeping

1263 6.152. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse
1264 is made, staff must keep clear and accurate records using a Concern Form.

1265 6.153. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded
1266 in writing. Information should be kept confidential and stored securely. It is good practice to keep
1267 concerns and referrals in a separate child protection file for each child. Schools/colleges using
1268 Databridge have Concern/Safeguarding logs to record any concerns being raised. A report per
1269 child/young person can also be generated.

1270 6.154. Records should be factual, accurate, concise, ethical and relevant.

1271 6.155. All recording of written information should be legible and discussions with other professionals and
1272 agencies should be recorded chronologically.

1273 6.156. The logs on Databridge will hold all safeguarding concerns for each Individual, with safeguarding
1274 documentation for that individual being held on the Safeguarding Drive. This is to enable the location
1275 to keep accurate records of any concerns raised regarding the individual and aid the monitoring/
1276 reviewing of safeguarding incidents.

1277 6.157. Each location will also maintain **25.07. Central Log of Concerns and Safeguarding** of all concerns raised
1278 at the location including the safeguarding information where the concern has escalated. This is kept
1279 electronically, access is restricted to the DSL, deputies and Safeguarding Officers only.

1280

1281

12 Monitoring

1283 6.158. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are
 1284 recorded, managed and responded to at the Location, at a regional level and at a whole divisional
 1285 level, see **section 9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key
 1286 Performance Indicators (KPIs) using **CambianKPI** and the identification and management of
 1287 safeguarding risks. A report on the position of every site in relation to their KPIs is produced every
 1288 Wednesday.

12 Training

1290 6.159. All staff will receive information regarding Child Protection and Safeguarding on induction. The
 1291 induction introduces the new staff member to the policy, procedure and practice at the location. They
 1292 will also be orientated as to where to find information regarding safeguarding including relevant
 1293 posters around the location. As part of their induction all staff are required to read this policy and
 1294 confirm that, they understand their role in safeguarding and protecting young people within the service
 1295 they are going to work.

1296 6.160. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must
 1297 be completed as part of staff member induction and annually thereafter. This should include online
 1298 safety. This is to maintain staff awareness of their responsibilities in relation to children /young
 1299 people/young adult's safeguarding.

1300 6.161. Staff will not be allowed to work with Individuals unless they have completed the above training. The
 1301 school/college/home must check that supply/agency staff have completed basic awareness training
 1302 before being allowed into contact with Individuals.

1303 6.162. Contractors and others on site who might have unsupervised access to Individuals must also complete
 1304 basic awareness training before being allowed to start work.

1305 6.163. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and
 1306 practice throughout the year. This can be undertaken in various forums: as a face-to-face or online
 1307 session, staff meetings or workshops. In addition to this, safeguarding updates including various
 1308 resources are provided to schools and colleges by the external Safeguarding Network.

1309 6.164. The DSL and Safeguarding Officers should undergo the same level of training providing them with the
 1310 knowledge and skills required to carry out the role. The DSL and Safeguarding Officers training should
 1311 be provided by the LA within the boundaries they operate and be refreshed at least every two years.
 1312 All should also undertake Prevent awareness training.

13 Confidentiality and information sharing

1314 6.165. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting
 1315 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear
 1316 powers to share, hold and use information for these purposes. Staff should be proactive in sharing
 1317 information as early as possible to help identify, assess and respond to risks or concerns about the
 1318 safety and welfare of children/ young people whether this is when problems are first emerging, or
 1319 where a child is already known to local authority children's social care.

1320 6.166. Where the police are involved, wherever possible the school or college should ask the police to obtain
 1321 consent from the individuals involved to share their statements and evidence for use in the employer's
 1322 disciplinary process. This should be done as their investigation proceeds and will enable the police to
 1323 share relevant information without delaying the conclusion of their investigation or any court case.

1324 6.167. The Safeguarding authority should adopt a similar procedure when making enquiries to determine
 1325 whether the child or children named in the allegation need protection or services, so that any
 1326 information obtained in the course of those enquiries which is relevant to a disciplinary case can be
 1327 passed to the employer without delay.

1328 6.168. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the
 1329 following:

- 1330 • who needs to know and exactly what information can be shared;
- 1331 • how to manage speculation, leaks and gossip
- 1332 • what, if any, information can be reasonably given to the wider community to reduce
1333 speculation; and
- 1334 • how to manage press interest if, and when, it should arise.
- 1335 6.169. Exchange or disclose of personal information with other agencies will be completed in accordance with
1336 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation
1337 including the Data Protection Act 2018 and GDPR which places duty on organisations and individuals
1338 to process personal information fairly and lawfully and to keep the information they hold safe and
1339 secure.
- 1340 6.170. Information relating to individual Safeguarding cases is confidential, although some information can
1341 be shared with relevant staff. This should be done only on a 'need to know' basis.
- 1342 6.171. Governance Boards and proprietor should ensure relevant staff have due regard to the relevant data
1343 protection principles, which allow them to share (and withhold) personal information, as provided for
1344 in the Data Protection Act 2018 and the GDPR. This includes:
- 1345 • being confident of the processing conditions which allow them to store and share
1346 information for safeguarding purposes, including information which is sensitive and
1347 personal, and should be treated as 'special category personal data'.
- 1348 • understanding that 'safeguarding of children and individuals at risk' is a processing
1349 condition that allows practitioners to share special category personal data. This
1350 includes allowing practitioners to share information without consent where there is
1351 good reason to do so, and that the sharing of information will enhance the
1352 safeguarding of a child in a timely manner but it is not possible to gain consent, it
1353 cannot be reasonably expected that a practitioner gains consent, or if to gain consent
1354 would place a child at risk.
- 1355 • for schools, not providing pupils' personal data where the serious harm test under the
1356 legislation is met. For example, in a situation where a child is in a refuge or another
1357 form of emergency accommodation, and the serious harms test is met, they must
1358 withhold providing the data in compliance with schools' obligations under the Data
1359 Protection Act 2018 and the GDPR. Where in doubt schools should seek independent
1360 legal advice.
- 1361 6.172. When sharing safeguarding information regarding an individual, staff will need to consider the
1362 following:
- 1363 • Information should only be shared on a 'need to know' basis when it is in the best
1364 interests of the individual
- 1365 • Informed consent should be obtained but, if this is not possible and other adults are at
1366 risk of abuse or neglect, it may be necessary to override the requirement
- 1367 • Distinguish fact from opinion
- 1368 • Ensure you are giving the right information about the right person
- 1369 • Ensure you are sharing information securely
- 1370 • Inform the person that the information has been shared if they were not already aware
1371 of this and if it would not create or increase risk of harm to them/others.

1372 6.173. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of
1373 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the
1374 need to safeguard and promote the welfare and protect the safety of children.

1375 6.174. Further details on information sharing can be found in:

- 1376 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-
1377 busting guide to information sharing
- 1378 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to](#)
1379 [Children, Young People, Parents and Carers](#). The seven golden rules for sharing
1380 information will be especially useful
- 1381 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and
1382 guidance from the department
- 1383 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection
1384 activity, including compliance with the GDPR.

1385 6.175. The following wording is to be added to any covering letter where we are sharing documentation:
1386 "The material contained in this letter and its enclosures are confidential to Cambian Group and the
1387 persons named within the documentation. The documentation is delivered only in accordance with a
1388 perceived legal obligation to make the documentation available and upon the strict understanding that
1389 the recipient and all members of the recipient's staff will undertake to preserve confidentiality and not
1390 in any way share the documentation or any details of the information therein contained with any other
1391 party. Any person receiving this information who breaches these obligations of confidentiality will be
1392 held strictly responsible and will be expected to indemnify Cambian Group and any persons named
1393 within the documentation against any losses that may arise as a result of misuse of this material".

1394 6.176. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details
1395 for the Caldicott Guardian at our location is:

1396 Sarah Longley-Cook – 07876 835633 - Sarah.Longleycook@cambianguroup.com

1397 6.177. Failure to follow this policy and local procedure may result in disciplinary action.

1398 **Complaints and Monitoring**

1399 6.178. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**
1400 **procedure**, with reference to the our Designated Safeguarding Officer who is Sophia Cursons (DSL) and
1401 Somerset Safeguarding Children's Board

1402 **7. Accountability**

1403 7.1. Sophia Cursons is the DSL at Lufton College and has lead responsibility for protecting and safeguarding
1404 children, young people and young adults and liaising with the local authority and other local agencies
1405 as appropriate. This includes young person protections, referrals, raising awareness, training,
1406 allocating resources and supporting/directing staff within the Location. In all matters, relating to young
1407 person protection and safeguarding Lufton College will follow the procedures outlined in this policy.

1408 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring
1409 by the Head of College. Our Managing Director, Chris Strong will undertake a full annual review of the
1410 content and effective application of this policy and associated procedures. The date for the next
1411 scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes
1412 in legislation, regulatory requirements or as a result of best practice guidance.

1413 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director
1414 Compliance, who will support and promote the development of initiatives to improve the prevention,
1415 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is
1416 also responsible for reporting on safeguarding and providing executive leadership.

- 1417 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1418 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect
1419 can be stressful and distressing for staff.
- 1420 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers,
1421 doctors, allied health professionals and nurses) should understand how their professional standards
1422 and requirements underpin their organisational roles to prevent, recognise and respond to abuse and
1423 neglect.
- 1424 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1425 need to share a common view of what types of behaviour may be abuse or neglect and what should
1426 be an initial response to suspicion or allegation of abuse or neglect.
- 1427 7.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency
1428 safeguarding policy as this policy is designed to complement rather than replace the multi-agency
1429 policies which define the local practice that must be followed.
- 1430 7.8. In the event that the DSL are on leave or away from the Location and not contactable alternative
1431 arrangements must be put in place, cascaded to staff and displayed so staff can access contact names
1432 and details if required.

1433 8. Further Safeguarding information – what everyone needs to know 1434 (Appendix 12)

- 1435 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm.
1436 Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education
1437 and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be
1438 signs that children are at risk. Other safeguarding issues such as child on child/young adult on young
1439 adult abuse staff should be aware of are explored in the **Appendix 12. Further Safeguarding**
1440 **information – what everyone needs to know.**

1441 9. Appendices

1442 Appendix 1: Relevant policies and documents

- 1443 1. Child Protection and Safeguarding
- 1444 a) 25.01 - Index Form for Individuals Concern File
- 1445 b) 25.02 - Abuse Poster Individual
- 1446 c) 25.03 - Individual Safeguarding booklet – Easy Read
- 1447 d) 25.04 - Concern Form
- 1448 e) 25.05 - Safeguarding Tracking Pack
- 1449 f) 25.06 – Visitor Information Leaflet template
- 1450 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
- 1451 h) 25.08 – Guidance to staff who had an allegation made against them
- 1452 i) 25.09 – Local Safeguarding procedure
- 1453 j) 25.10 – Staff Safeguarding Information poster
- 1454 k) 25.11 – Guidance notes for Designated or On call person
- 1455 l) 25.12 – Static body chart
- 1456 m) 25.13 – Weekly body chart

1457	n) 25.14 – Guidance for Investigating Unexplained Body Marks
1458	o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
1459	2. Whistleblowing
1460	3. Anti-bullying
1461	4. Child Sexual Exploitation
1462	5. Intimate and Invasive Care
1463	6. Self-harm and suicide
1464	7. Behaviour Support
1465	8. Physical Intervention
1466	9. Complaints Policy
1467	10. Health
1468	11. E –safety
1469	12. Capacity to consent
1470	13. Prevent
1471	14. Recruitment
1472	15. Code of Conduct
1473	16. Data Protection
1474	17. Confidentiality
1475	18. E- safety
1476	19. Disciplinary
1477	20. Complaints
1478	21. Code of Practice
1479	22. Mobile telephony
1480	23. SUI Caretech children’s services process
1481	24. Caretech - Group Leaving Policy
1482	25. GHR 02 – Harassment and Bullying
1483	26. GHR 41 – Reference Requests
1484	27. GHR 41.1 DBS referral log
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Appendix 2: Legislation and guidance

- [The Children Act 2004, as amended by the Children and Social Work Act 2017](#)
- [Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes \(England\) Regulations 2015 in force as of 1st April 2015](#)
- [Guide to the Young people's/care home Homes Regulations including the Quality Standards \(DfE: April 2015\)](#)
- [Prevent Duty Guidance: for England and Wales \(March 2015\) \(Prevent\). Prevent is supplemented by The Prevent duty: Departmental advice for schools and young person minders \(June 2015\) and The use of social media for on-line radicalisation \(July 2015\)](#)
- [The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2015](#)
- [Female Genital Mutilation Act 2003, \(as inserted by section 74 of the Serious Crime Act 2015\)](#)
- [Terrorism Act 2000](#)
- [Counter Terrorism and Security Act 2015](#)
- [The School staffing regulations , England 2009](#)
- [The Teachers Disciplinary regulations, 2012](#)
- [Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.](#)
- [All Wales Child Protection Procedures 2008](#)
- [All Wales POVA Guidance 2008](#)
- [Keeping learners safe | GOV.WALES](#)
- [The Care Act 2014](#)
- [Social services and wellbeing Act 2014](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping children safe in Education 2021](#)
- [Keeping children safe in education - part one 2021](#)
- [Regulated activity in relation to children: scope](#)
- [What to do if you're worried a child is being abused](#)
- [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- [Violence against women and girls](#)
- <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>
- [Teaching online safety in school.pdf](#)
- [Supporting practice in tackling child sexual abuse - CSA Centre](#)

1536 DSL– DSL CSC– Children’s Social Care
1537 CAF – Common Assessment framework LADO – Local Authority Designated Officer
1538
1539



DSL

Appendix 4: Types of abuse – children

- Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children
- Physical abuse:** a form of abuse, which may involve hitting, slapping, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children or young adults by other young adults or between individuals of different age is a specific safeguarding issue in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it.
- Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology.
- Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through social media, online games or other channels of digital communication. Children can also be re-victimised if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual communication with a child; and, causing a child to view images or watch videos of a sexual act. Using technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that are perpetrated online and constitute abuse, children may also be exposed to online harms, such as inappropriate behaviours or content online. For instance, children may be bullied online by other children/young people/young adults they know/others who they don't know or they might, either accidentally or intentionally, view content, which is intended for adults. Both online abuse and exposure to unsuitable content or behaviour can have a long-lasting impact on the wellbeing of children and young people.

Appendix 5: Types of abuse - adults

- **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding or withholding food, unauthorized restraint, restricting movement.
- **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the honour of the family and/or the community including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be handled and escalated as such. Professionals in all agencies, individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality.
- **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non-consensual masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, Indecent exposure.
- **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy, appointee ship or other legal authority.

- 1688 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as
1689 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that
1690 realistically they never will be able to.
- 1691 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage
1692 and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation
1693 (known as ‘protected characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks
1694 or inappropriate use of language related to a protected characteristic, denying access to
1695 communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or
1696 deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare,
1697 education, employment and criminal justice relating to a protected characteristic, substandard service
1698 provision relating to a protected characteristic.
- 1699 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-
1700 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership
1701 and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and
1702 disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect
1703 for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate
1704 food and drink, or assistance with eating, not offering choice or promoting independence, misuse of
1705 medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of
1706 individuals’ cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference
1707 with personal correspondence or communication, failure to respond to complaints.
- 1708 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,
1709 stimulation and activity, personal or medical care, providing care in a way that the person dislikes,
1710 failure to administer medication as prescribed, refusal of access to visitors, not taking account of
1711 individuals’ cultural, religious or ethnic needs, not taking account of educational, social and recreational
1712 needs, ignoring or isolating the person, preventing the person from making their own decisions,
1713 preventing access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
- 1714 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of
1715 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,
1716 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise
1717 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more
1718 appropriate under the parts of the Care Act dealing with assessment, planning, information and
1719 advice, and prevention.
- 1720
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- 1722
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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
- Unsuitable clothing or not enough clothes

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1771 Domestic abuse

- 1772 • becoming anxious or depressed
- 1773 • having difficulty sleeping
- 1774 • complaining of physical symptoms such as tummy aches
- 1775 • starting to wet their bed
- 1776 • behaving as though they are much younger than they are
- 1777 • having problems with school
- 1778 • becoming aggressive or they may internalise their distress and withdraw from other people
- 1779 • having a lowered sense of self-worth
- 1780 • older children may begin to play truant or start to use alcohol or drugs
- 1781 • they beginning to self-harm by taking overdoses or cutting themselves

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1783 Child on Child/Young adult on young adult abuse/between individuals of different age

- 1784 • absence from school or disengagement from school activities
- 1785 • physical injuries
- 1786 • mental or emotional health issues
- 1787 • becoming withdrawn – lack of self esteem
- 1788 • lack of sleep
- 1789 • alcohol or substance misuse
- 1790 • changes in behavior
- 1791 • inappropriate behavior doe age
- 1792 • abusive towards others

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Appendix 7: Signs that someone could be an abuser

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

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1870 **Appendix 8: DSL, Head of College (if the concern/allegation is related to staff) – actions, reporting and**
1871 **recording procedure**

- 1872 • Staff notifies the DSL /Head of College of their concern as soon as it is possible but no later than within
1873 1 hour from the moment of disclosure/report from the child/young person/other person, completes
1874 and passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of
1875 disclosure/report. If the DSL is unavailable, passes it on to the DSL. In Education, if the concern is related
1876 to the staff and the Head of College is not available, staff must report their concern to the DSL instead,
1877 so there is no delay in reporting of the concern. The DSL will then liaise with the Head of College to
1878 agree on the next step. Services using Databridge: staff must report their concern verbally before
1879 completing the Concern/Safeguarding log in the system.
- 1880 • DSL or Head of College (depending on who will lead on the case) ensures that the concern is recorded
1881 on the **25.07. Central Log of Concerns and Safeguarding**, the concern reference number is then added
1882 to the concern form on Databridge. The DSL or Head of College reviews the concern and decides on
1883 the next step which may lead to Safeguarding Tracking Pack being opened (Safeguarding Tracking
1884 Pack is built as part of the concern form should the case proceed to safeguarding).
- 1885 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL or Head of
1886 College will then also additionally allocate the next sequential Safeguarding Reference number on the
1887 **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and
1888 immediately (or at least within one hour of receiving the concern form, make a referral to the local
1889 Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to discuss
1890 the allegation and agree a course of action. DSL or Head of College using the Databridge system will
1891 progress to the next stage – Safeguarding part of the concern/Safeguarding log which is only
1892 accessible to the Safeguarding Team.
- 1893 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a
1894 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on
1895 the Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial
1896 Informal Investigation. The Head of College/DSL MUST ensure that a member of their Senior
1897 Management Team is assigned to look into the concern. The review must be recorded and outcomes
1898 shared with the people involved. Feedback from the review session MUST be provided to local
1899 Safeguarding Authority/LADO.
- 1900 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be
1901 taken. This diligent approach will ensure a clear historic record of contact with local Safeguarding
1902 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with
1903 the local Safeguarding Authority/LADO whichever appropriate.
- 1904 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that
1905 it requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack**
1906 must be opened with the next sequential Safeguarding Reference included on the form and details as
1907 such entered on the central log.
- 1908 • Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the
1909 **Responsible/Nominated Individual** and in day schools - **Regional Education Manager** as a follow up to
1910 the initial reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual**
1911 **and Regional Education Manager** on completion, providing detailed overview of the actions taken and
1912 the final outcome. The **Responsible/Nominated Individual and Regional Education Manager** in day
1913 schools will update relevant Directors. This original form will be saved in the Safeguarding file.
- 1914 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the
1915 local Police should be informed immediately as well and they can take immediate protective action as
1916 necessary.
- 1917 • If the matter is a more general concern then ensure that the 'Action Taken' log on the concern form is
1918 completed and the form is saved on the Databridge system. Either way the form must be signed by
1919 the DSL or Head of College.

- 1920 • The relevant concern form should be referenced in the **25.07 Central Log of Concerns and**
1921 **Safeguarding**. Services using Databridge will be able to filter information per chosen criteria and also
1922 generate reports per each child/young person in the school, college, children's or care homes.
- 1923 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking**
1924 **Pack on Databridge**.
- 1925 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed
1926 in writing that the concern is closed and Responsible/Nominated Individual and Regional Education
1927 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is
1928 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-**
1929 **off have been completed.**
- 1930 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local
1931 Authority and/or the police. The individual can be kept in their care home or on the school/college site
1932 fully supported (e.g. if they are a day student) if advised to do so.
- 1933 • The parent/carers should be informed and a decision should be made with the Local Authority and the
1934 Police about what action is to be taken and whom by.
- 1935 • If the DSL or Head of College is unsure about what the Individual has said or what has been said by
1936 others they can phone the Local Authority to discuss concerns. To do so would not constitute an abuse
1937 referral but may help to clarify the situation but they must record all details of any conversation and
1938 advice received on a concern form. He/she can then move to a formal referral or actively monitor the
1939 situation.
- 1940 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or
1941 allegation of abuse directed against anyone working within the establishment. The establishment
1942 MUST not internally investigate any allegations of abuse without first taking instruction from the local
1943 Safeguarding Authority/LADO.
- 1944 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal
1945 management investigation (level 2), the investigation process will commence.
- 1946 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the
1947 external agency (level 3), Head of College, DSL will take appropriate steps to assist the external agency
1948 to ensure the investigation is completed without a delay.
- 1949 • Registered Manager MUST notify relevant regulator by submitting specific statutory notification within
1950 the time frame specified by their regulator. This is regardless of who leads on the investigation and
1951 whether or not the investigation has been concluded.
- 1952 • If as the result of an investigation there has been a substantiated allegation against a member of staff,
1953 we will work with the local Safeguarding Authority/LADO to determine whether there are any
1954 improvements to be made to our safeguarding policy, procedures and practice to prevent similar
1955 events in the future. Also, we will work with our internal Human Resources department and may
1956 commence proceedings under **GHR 27. Disciplinary policy and procedure**.
- 1957 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.
1958 Records are kept of all conversations as part of the investigation process and made available as
1959 required.
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Appendix 9: Key contacts

Designated Safeguarding Lead (DSL) is Sophia Cursons, Head of College & Registered Manager

Telephone (24hrs) 07766 141296 **Email:** Sophia.Cursons@cambiangroup.com

Safeguarding Officers are:

Emily Martina	Data Analyst	01935 415907	Emily.Martina@cambiangroup.com
Tracy Palmer	Administration Manager	01935 403120	Tracy.Palmer@cambiangroup.com
Hollie Earley	Occupational Therapist	01935 403120	Hollie.Earley@cambiangroup.com
Jade Tillson	Deputy Head of Care	07525 632977	Jade.Tillson@Cambiangroup.com
Hannah Hastilow	Head of Education	07748 788627	Hannah.Hastilow@Cambiangroup.com

Head of Service is:

Sophia Cursons	Head of College & Registered Manager	07766 141296	Sophia.Cursons@cambiangroup.com
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Cambian Regional Leads are:

Hayley Lukaszewski	Education Care Lead	07585 304047	Hayley.Lukaszewski@cambiangroup.com
Simon Brown	SEN Education	07425 649720	Simon.Brown@cambiangroup.com

Operations Director is:

Andrew Sutherland	Managing Director For Education	0208 735 6150	Andrew.Sutherland@cambiangroup.com
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Managing Director for Education is Christopher Strong

Telephone: 07983413662	Email: Christopher.Strong@caretech-uk.com
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Group Executive Director – Children’s Services is Jeremy Wiles

Telephone: 079190232207	Email: Jeremy.Wiles@caretech-uk.com
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Group Lead Safeguarding is Christina Leath (Compliance and Regulation)

Telephone: 01707 601 800	Email: Christina.Leath@caretech-uk.com
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Representative, Proprietor - Caretech Education Services is Christopher Strong – MD of Education Services

Telephone: 07983413662	Email: Christopher.Strong@caretech-uk.com
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Local authority / Local Safeguarding Children’s Partnership/ Local Safeguarding Adult’s Board

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

Somerset Safeguarding Children’s Partnership

Telephone (24hrs): 0300 123 2224

Somerset Safeguarding Adults Board

Telephone (24hrs): 0300 123 2224

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

Outside of office hours you call also call:

Avon & Somerset Police 101 or in an emergency 999

For young people under the age of 18:

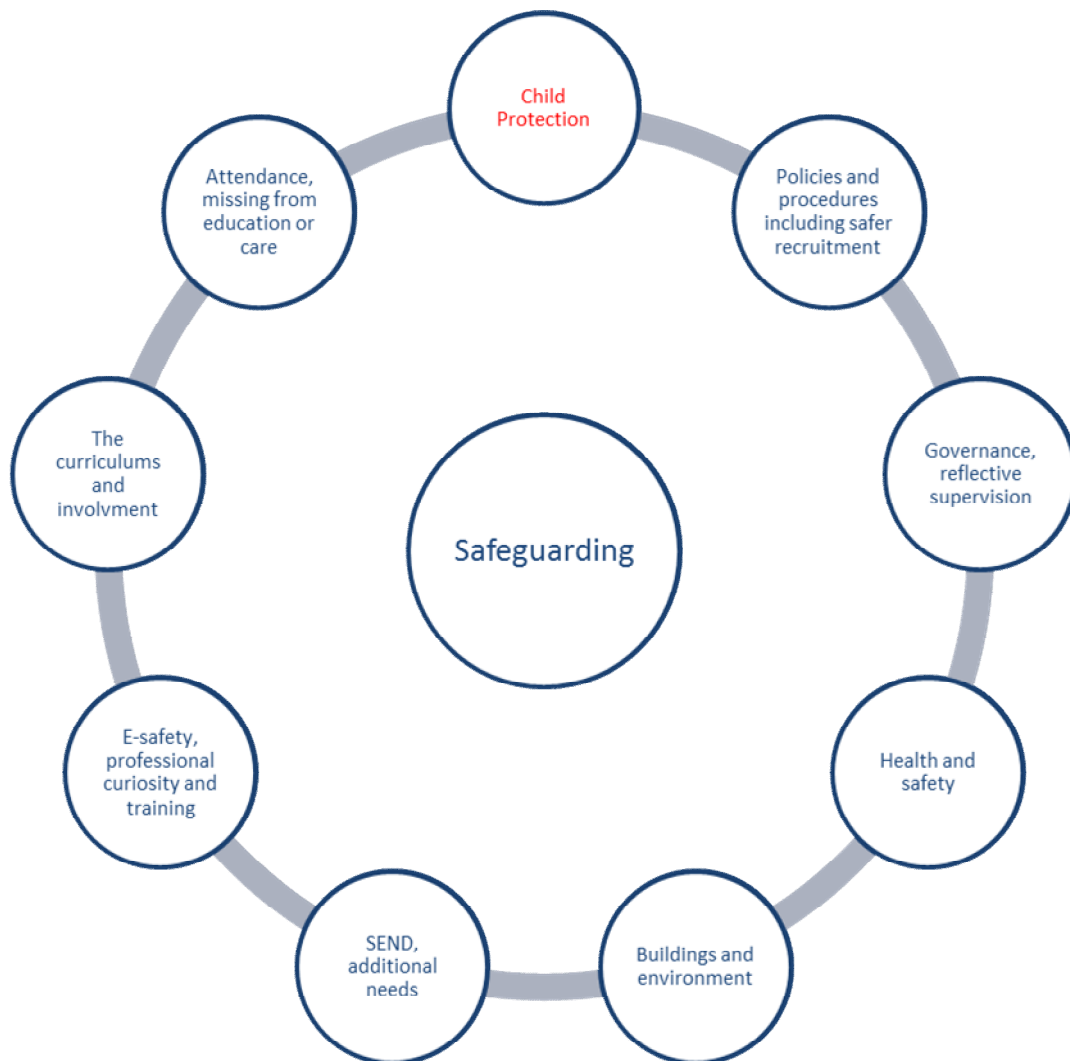
The Local Authority Designated Officer (LADO) is Anthony Goble

Telephone: 0300 123 2224 (Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-5:00pm. Outside of office hours/weekends, the emergency duty team can be contacted on: 0300 123 2224).

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Appendix 10. Safeguarding in children's Services - illustration

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Appendix 11. Low – level concerns (Education)

- 2073 9.1. As part of their whole school or college approach to safeguarding, schools and colleges should ensure
2074 that they promote an open and transparent culture in which all concerns about all adults working in or
2075 on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with
2076 promptly and appropriately.
- 2077 9.2. The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern
2078 – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' -
2079 that an adult working in or on behalf of the school or college may have acted in a way that:
- 2080 • is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
2081 and
 - 2082 • does not meet the harm threshold or is otherwise not serious enough to consider a referral to
2083 the LADO.
- 2084 Examples of such behaviour could include, but are not limited to:
- 2085 • being over friendly with children
 - 2086 • having favourites
 - 2087 • taking photographs of children on their mobile phone, contrary to school policy
 - 2088 • engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
 - 2089 • humiliating pupils.

2090 **Sharing Low - level concerns**

- 2091 9.3. Schools must have their site procedure for sharing low-level concerns which is clear, easy to
2092 understand and implement.
- 2093 9.4. Whether all low-level concerns are shared initially with the DSL (or other nominated person for example
2094 Safeguarding Officers) is a matter for the school or college to decide. If the former, then the DSL should
2095 inform the Head of College of all the low-level concerns and in a timely fashion according to the nature
2096 of each particular low-level concern. **The Head of College should be the ultimate decision maker in
2097 respect of all low-level concerns**, although it is recognised that depending on the nature of some low-
2098 level concerns and/or the role of the DSL in some schools/colleges, the Head of College may wish to
2099 consult with the DSL and take a more collaborative decision-making approach. Some schools' or
2100 college's Head of College is also the DSL in which case all low – level concerns should be reported to
2101 them or other nominated person for example Officer).
- 2102 9.5. Low-level concerns which are shared about supply staff and contractors should be notified to their
2103 employers, so that any potential patterns of inappropriate behaviour can be identified.
- 2104 9.6. If schools and colleges are in any doubt as to whether the information which has been shared about
2105 a member of staff as a low-level concern in fact meets the harm threshold, they should consult with
2106 their LADO.
- 2107 9.7. Schools and colleges should ensure they create an environment where staff are encouraged and feel
2108 confident to self-refer, where, for example, they have found themselves in a situation which could be
2109 misinterpreted, might appear compromising to others, and/or on reflection they believe they have
2110 behaved in such a way that they consider falls below the expected professional standards.
- 2111 9.8. Creating a culture in which all concerns about adults (including allegations that do not meet the harms
2112 threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is
2113 critical. If implemented correctly, this should encourage an open and transparent culture; enable
2114 schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise
2115 the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear
2116 about professional boundaries and act within these boundaries, and in accordance with the ethos and
2117 values of the institution.

2 Responding to low - level concerns

- 2119 9.9. If the concern has been raised via a third party, the head teacher/principal (or a nominated deputy)
2120 should collect as much evidence as possible by speaking:
- 2121 • directly to the person who raised the concern, unless it has been raised anonymously, and
2122 • to the individual involved and any witnesses.
- 2123 9.10. The information collected will help them to categorise the type of behaviour and determine what further
2124 action may need to be taken. This information needs to be recorded in writing along with the rationale
2125 for their decisions and action taken.

21 Recording low - level concerns

- 2127 9.11. All low-level concerns should be recorded in writing. The Concern/Safeguarding slip in Behaviour
2128 Watch should be completed, as this is the place to record all concerns being raised. The record should
2129 include details of the concern, the context in which the concern arose, and action taken. The name of
2130 the individual sharing their concerns should also be noted, if the individual wishes to remain
2131 anonymous then that should be respected as far as reasonably possible.
- 2132 9.12. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or
2133 concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or
2134 college should decide on a course of action, either through its disciplinary procedures or where a
2135 pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it
2136 should be referred to the LADO.
- 2137 9.13. Consideration should also be given to whether there are wider cultural issues within the school or
2138 college that enabled the behaviour to occur and where appropriate policies could be revised, or extra
2139 training delivered to minimise the risk of it happening again.
- 2140 9.14. It is for schools and colleges to decide how long they retain such information, but it is recommended
2141 that it is retained at least until the individual leaves their employment.
2142

Appendix 12. Further Safeguarding information – what everyone needs to know

Contextual safeguarding

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

9.16. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, and serious youth violence, county lines and radicalisation. Further advice is provided in the [Home Office’s Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

9.17. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face-to-face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

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

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

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

Bullying

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

2191 Child on child/young adults on young adult/ between children of different age's abuse

- 2192 9.22. Boarding schools, residential special schools, residential colleges and children's homes and care
2193 homes for young adults attending education (FE colleges) have additional factors to consider with
2194 regard to safeguarding. Schools and colleges that provide such residential accommodation and/or
2195 are registered as children's homes should be alert to signs of abuse in such settings (for example,
2196 inappropriate pupil or student relationships and the potential for the abuse between individuals of the
2197 same/similar age or different age, particularly in schools and colleges where there are significantly
2198 more girls than boys or vice versa) and work closely with the host local authority and, where relevant,
2199 any local authorities that have placed their children there. All residential setting within the Organisation
2200 children's service will continuously maintain their communication with the internal and external
2201 Education providers to ensure the additional factors are being considered and any concerns shared in
2202 a timely manner and with the right people.
- 2203 9.23. All staff should be aware that children can abuse other children/young adults can abuse other young
2204 adults and that the abuse can also take place between individuals of different age and that it can
2205 happen both inside and outside of school/college/children's/care home and online. It is important that
2206 all staff recognise the indicators and signs of the abuse and know how to identify it and respond to
2207 reports. In some schools, colleges, children's / care homes site – based or regional members of therapy
2208 teams might need to be involved and support the SLT to identify the most effective ways of
2209 communication with the child/young adult who may have potentially been the victim of child on
2210 child/young adult on young adult/ between individuals of different age abuse and who instigated it.
- 2211 9.24. It must be recognised that children and young people would require varied approaches and
2212 communication mechanisms to be present and available so they can report abuse. Children must be
2213 regularly reassured that their concern/reports will be treated seriously every time they report it.
- 2214 9.25. Children needs to be told what will happen from the moment their concern is shared, so the lack of
2215 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.
2216 Children need to know that that their concerns will be investigated and dealt with. Child's/young
2217 person's preference in terms of how feedback should be provided must be taken into consideration so
2218 this can be planed for in advance.
- 2219 9.26. The communication with each individual throughout the process of child on child/young adult on young
2220 adult or between individuals of different age investigation must be regular, proportionate and take
2221 place using suitable communication.
- 2222 9.27. In [Ofsted review of sexual abuse in schools and colleges](#) young people stated that some of them didn't
2223 receive timely and appropriate support from the school/college, hence the communication and support
2224 must become one of the critical points of a significant priority to those responding to and those
2225 managing child on child/young adult on young adult/between individuals of different age abuse cases
2226 including those of a sexual nature. Other consideration for all providers were:
- 2227 • to assume it is happening here and plan accordingly
 - 2228 • work on and strengthen the whole school, college, children's/care home approach to
 - 2229 developing a safeguarding culture
 - 2230 • to ensure staff model respectful behaviour
 - 2231 • to ensure children and young people are clear about acceptable and unacceptable behaviour
 - 2232 • to ensure children/young people are confident to ask for help
 - 2233 • to ensure carefully planned and implemented RSHE curriculum
 - 2234 • to ensure the behavioural approach with sanctions & interventions for poor behaviour
 - 2235 • to have mechanisms to support students who need it in the way they need it

- 2236 • to ensure staff have access to suitable training & that there is clear expectation for staff and
2237 Managers
- 2238 • to ensure pupil's voice is heard and responded to
- 2239 • to ensure DSLs have some protected time to engage with local safeguarding partners and
2240 LADOs, so those relationships can be strengthened.
- 2241 • to ensure staff follow the guidance in Keeping Children Safe in Education
2242
- 2243 9.28. All staff should understand that even if there are no reports in their schools or colleges it does not mean
2244 it is not happening, it may be the case that it is just not being reported. As such, it is important if staff
2245 have any concerns regarding child on child/young adult on young adult abuse or abuse between
2246 individuals of different age, they should speak to their DSL.
- 2247 9.29. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and
2248 harassment. Staff must NOT take the view that it doesn't not happen in their setting.
- 2249 9.30. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but
2250 that all types of abuse between children of the same, similar of different ages is unacceptable and will
2251 be taken seriously. It is essential that all victims are reassured that they are being taken seriously and
2252 that they will be supported and kept safe.
- 2253 9.31. Abuse between individuals of the same, similar or different age is most likely to include, but may not
2254 be limited to:
2255
- 2256 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
2257 • abuse in intimate personal relationships between peers
2258 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical
2259 harm (this may include an online element which facilitates, threatens and/or encourages physical
2260 abuse)
2261 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
2262 element which facilitates, threatens and/or encourages sexual violence). For further information
2263 about sexual violence see [Part 5 of KCSIE2022 and Annex B](#)
2264 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which
2265 may be standalone or part of a broader pattern of abuse; For further information about sexual
2266 harassment see [Part 5 of KCSIE2022 and Annex B](#).
2267 • causing someone to engage in sexual activity without consent, such as forcing someone to strip,
2268 touch themselves sexually, or to engage in sexual activity with a third party
2269 • consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also
2270 known as sexting or youth produced sexual imagery). For more information about this read UKCIS
2271 guidance: [Sharing nudes and semi-nudes advice for education settings](#).
2272 • Upskirting which typically involves taking a picture under a person's clothing without their permission,
2273 with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the
2274 victim humiliation, distress or alarm; and
- 2275 9.32. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or
2276 humiliation used as a way of initiating a person into a group and may also include an online element)
- 2277 9.33. Staff must be clear as to the school/college's/home's procedures with regards to child on child/young
2278 adult on young adult abuse, abuse between individuals of different age and the important role they
2279 have to play in preventing it and responding where they believe a child may be at risk from it.
- 2280 9.34. All Individuals will be provided with safeguarding information in a format, which is appropriate for their
2281 understanding and communication. This may take the form of posters or a leaflet/booklet.

2282 9.35. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing
2283 bottoms, breasts or genitals, pinging or flicking bras, lifting skirts or pulling down trousers will be
2284 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.
2285 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated
2286 or acceptable. However, it is critical to state that some children with cognitive impairment may not be
2287 able to fully understand how children on the receiving end of such behaviour may feel, therefore staff
2288 will work with each of the children affected by the situation in order to enhance their understanding of
2289 the seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

2290 **Serious violence**

2291 9.36. All staff should be aware of the indicators, which may signal children are at risk from, or are involved
2292 with serious violent crime. These may include increased absence from school, a change in friendships
2293 or relationships with older individuals or groups, a significant decline in performance, signs of self-
2294 harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts
2295 or new possessions could also indicate that children have been approached by, or are involved with;
2296 individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

2297 9.37. All staff should be aware of the range of risk factors which increase the likelihood of involvement in
2298 serious violence, such as being male, having been frequently absent or permanently excluded from
2299 school, having experienced child maltreatment and having been involved in offending, such as theft or
2300 robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence
2301 and gang involvement and its [Preventing youth violence and gang involvement](#).

2302 9.38. Sexual violence and sexual harassment can occur between two or more children of any age and sex,
2303 from primary through to secondary stage and into college. It can occur also through a group of children
2304 sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual
2305 harassment exist on a continuum and may overlap; they can occur online and face-to-face (both
2306 physically and verbally) and are never acceptable. Schools and colleges should be aware of the
2307 importance of:

- 2308 • making clear that there is a zero-tolerance approach to sexual violence and sexual
2309 harassment that it is never acceptable, and it will not be tolerated. It should never be passed
2310 off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to
2311 do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst-
2312 case scenarios a culture that normalises abuse, leading to children accepting it as normal and
2313 not coming forward to report it.

- 2314 • recognising, acknowledging, and understanding the scale of harassment and abuse and that
2315 even if there are no reports it does not mean it is not happening, it may be the case that it is
2316 just not being reported.

- 2317 • challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms,
2318 breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or
2319 tolerating such behaviours risks normalising them.

2320 9.39. Sexual violence and sexual harassment between children can occur between two children of **any age**
2321 **and sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur
2322 through a group of children sexually assaulting or sexually harassing a single child or group of children.

2323 9.40. Children who are victims of sexual violence and sexual harassment will likely find the experience
2324 stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and
2325 will be exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same
2326 children's/care home. Sexual violence and sexual harassment exist on a continuum and may overlap;
2327 they can occur online and face to face (both physically and verbally) and are never acceptable. All staff
2328 working with children are advised to maintain an attitude of 'it could happen here'.

- 2329 9.41. It is essential that all victims are reassured that they are being taken seriously and that they will be
2330 supported and kept safe. **A victim should never be given the impression that they are creating a**
2331 **problem by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel
2332 ashamed for making a report.
- 2333 9.42. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential
2334 that victims are protected, offered appropriate support and every effort is made to ensure their
2335 education is not disrupted. It is also important that other children, adult students and school and college
2336 staff are supported and protected as appropriate.
- 2337 9.43. There is support available for schools and colleges. Paragraph 52 and Annex A in the [Sexual Violence](#)
2338 [and Sexual Harassment Between Children in Schools and Colleges](#) advice provides detailed
2339 information and links to resources.
- 2340 9.44. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children
2341 with special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2342 9.45. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm.
2343 However, children who are LGBT can be targeted by other children. In some cases, a child who is
2344 perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children
2345 who identify as LGBT.
- 2346 9.46. Risks can be compounded where children/young people who are LGBT lack a trusted adult with whom
2347 they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and
2348 provide a safe space for them to speak out or share their concerns with members of staff.
- 2349 9.47. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and](#)
2350 [Health Education](#) curriculum and there is a range of support available to help schools counter
2351 homophobic, biphobic and transphobic bullying and abuse.
- 2352 9.48. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected
2353 to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour
2354 is developmentally inappropriate and may cause developmental damage. An umbrella term for these
2355 types of behaviour are often referred to as **"harmful sexual behaviour"**. The term has been widely
2356 adopted in child protection. Harmful sexual behaviour can occur online and/or offline and can also
2357 occur simultaneously between the two. Harmful sexual behaviour should be considered in a child
2358 protection context.
- 2359 9.49. Situations where children/young people are forced or coerced into sexual activity by peers or
2360 associates can be related with gang / serious youth violence activity but that is not always the case.
2361 Peer influence or peer pressure is a major factor in the decisions made by young people to join
2362 particular groups. Many young people see it as a "way out" from their day-to-day life and feel a strong
2363 bond with their peers, one which they may be lacking at home. Examples of peer-on-peer abuse
2364 including sexualised online bullying include:
- 2365 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and
2366 psychological, that makes a person feel unwelcome, marginalised, excluded,
2367 powerless or worthless because of their colour, ethnicity, culture, faith community,
2368 national origin or national status.
 - 2369 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where
2370 sexuality or gender is used as a weapon by boys or girls, this may also include any of
2371 the following:
 - 2372 - spreading rumors about someone's alleged sex life
 - 2373 - using offensive terms to describe a person
 - 2374 - inappropriate touching or attempts to do so
 - 2375 - non-consensual sharing of sexual images and videos

- 2376 - unwanted sexual comments and messages, including those on social media
- 2377 - any sexual exploitation, coercion and threats
- 2378 - sexual assault and rape
- 2379 • **Upskirting** - taking a picture under a person's clothing without their permission and /or
- 2380 knowledge, with the intention of viewing their genitals or buttocks (with or without
- 2381 underwear) to obtain sexual gratification, or cause the victim humiliation, distress or
- 2382 alarm. It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism
- 2383 Offences Act, which was commonly known as the Upskirting Bill, was introduced on 21
- 2384 June 2018. It came into force on 12 April 2019.
- 2385 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are
- 2386 transgender, thought to be transgender, or whose gender expression doesn't conform
- 2387 to traditional gender roles. Transphobia can prevent transgender and gender
- 2388 nonconforming people from living full lives free from harm.
- 2389 • **Homophobic Bullying** - targets someone because of their sexual orientation (or
- 2390 perceived sexual orientation);
- 2391 • **Disablist Bullying** - targets a young person solely based on their disability. This can
- 2392 include manipulative bullying where a perpetrator forces the victim to act in a certain
- 2393 way, or exploiting a certain aspect of the victim's disability.
- 2394 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect
- 2395 attitude (usually negative) towards an individual based solely on the individual's
- 2396 membership of a social group. For example, a person may hold prejudiced views
- 2397 towards a certain race or gender etc. (e.g. sexist).
- 2398 • **Discrimination** is the behaviour or actions, usually negative, towards an individual or
- 2399 group of people, especially on the basis of sex/race/social class.
- 2400 9.50. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE2022/Part 5](#)
- 2401 and more details about how to respond have been included in [KCSIE 2022 Part 5. Child on child sexual](#)
- 2402 [violence and sexual harassment.](#)
- 2403 What staff should do if they have concerns about the child/young person
- 2404 9.51. Staff working with children/young people are advised to maintain an attitude of 'it could happen here'
- 2405 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff
- 2406 should always act in the best interests of the child/young person
- 2407 9.52. If staff have any concerns about a child's/young person welfare, they should act on them immediately
- 2408 by following this procedure and reporting their concern to the DSL.
- 2409 **Opportunities to teach safeguarding**
- 2410 9.53. Schools/colleges must ensure that their staff undergo regular updated safeguarding training, including
- 2411 online safety and for children to be taught about how to keep themselves and others safe, including
- 2412 online, that safeguarding training for staff, including online safety training, is integrated, aligned and
- 2413 considered as part of the whole school or college safeguarding approach and wider staff training and
- 2414 curriculum planning.
- 2415 9.54. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities
- 2416 of individual children/young people, including those who are victims of abuse, and children/young
- 2417 people with special educational needs or disabilities.
- 2418 9.55. Whilst considering the above training requirements, governance boards and proprietor should have
- 2419 regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour
- 2420 effectively to ensure a good and safe educational environment and requires teachers to have a clear
- 2421 understanding of the needs of all pupils.

- 2422 9.56. Schools and colleges play a crucial role in preventative education. Preventative education is most
2423 effective in the context of a whole-school or college approach that prepares pupils and students for life
2424 in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia,
2425 biphobic and sexual violence/harassment.
- 2426 9.57. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may
2427 cover relevant issues through tutorials). This may include covering relevant issues for schools through
2428 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary
2429 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be
2430 found here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and](#)
2431 [health education](#).
- 2432 9.58. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:
2433 [Teaching about relationships sex and health](#). This includes teacher-training modules on the RSHE topics
2434 and non-statutory implementation guidance. Further guidance focused on teaching relationships
2435 education specifically to prevent sexual harassment and sexual violence will be published in Spring
2436 2022. The following resources plus many more listed in [Annex B](#), may also help schools and colleges
2437 understand and teach about safeguarding:
- 2438 • DfE advice for schools: [teaching online safety in schools](#);
 - 2439 • UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#);
 - 2440 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working](#)
2441 [with children and young people](#);
 - 2442 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the
2443 maximum impact of any online safety sessions delivered by external visitors;
 - 2444 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
 - 2445 • LGFL '[Undressed](#)' provided schools advice about how to teach young children about
2446 being tricked into getting undressed online in a fun way without scaring them or
2447 explaining the motives of sex offenders.
 - 2448 • Public Health England: [Every Mind Matters](#)
 - 2449 • [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any
2450 online challenges and hoaxes, sharing information with parents and carers and where
2451 to get help and support.
- 2452 9.59. Whilst it is essential that governance boards and proprietor ensure that appropriate filters and
2453 monitoring systems are in place, they should be careful that "over blocking" does not lead to
2454 unreasonable restrictions as to what children can be taught with regard to online teaching and
2455 safeguarding
- 2456 9.60. As schools and colleges increasingly work online, it is essential that children are safeguarded from
2457 potentially harmful and inappropriate online material. Whilst it is essential that governance boards and
2458 proprietor ensure that appropriate filters and monitoring systems are in place, they should be careful
2459 that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with
2460 regard to online teaching and safeguarding

2461 Online safety

- 2462 9.61. It is essential that children are safeguarded from potentially harmful and inappropriate online material.
2463 An effective whole school and college approach to online safety empowers a school or college to
2464 protect and educate pupils, students, and staff in their use of technology and establishes mechanisms
2465 to identify, intervene in, and escalate any concerns where appropriate.
- 2466 9.62. The breadth of issues classified within online safety is considerable, but can be categorised into four
2467 areas of risk which we'll refer to as 4Cs later on:

- 2468
- 2469
- 2470
- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- 2471
- 2472
- 2473
- 2474
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- 2475
- 2476
- 2477
- 2478
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- 2479
- 2480
- 2481
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group <https://apwg.org/>

2482 9.63. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising

2483 and implementing policies and procedures. This will include considering how online safety is reflected

2484 as required in all relevant policies and considering online safety whilst planning the curriculum, any

2485 teacher training, the role and responsibilities of the DSL and any parental engagement.

2486 Online safety policy

2487 9.64. Online safety and the school or college’s approach to it should be reflected in the child protection policy.

2488 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college

2489 should have a clear policy on the use of mobile and smart technology. Amongst other things this will

2490 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone

2491 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually

2492 harass their peers via their mobile and smart technology, share indecent images: consensually and

2493 non-consensually (often via large chat groups), and view and share pornography and other harmful

2494 content. Schools and colleges should carefully consider how this is managed on their premises and

2495 reflect in their mobile and smart technology policy and their child protection policy.

2496 9.65. Information and support available to schools and colleges to keep children safe online can be found

2497 in [Part 2 and Annex B of KCSIE2022](#).

2498 Remote Learning

2499 9.66. The DfE has provided advice to support schools and colleges to help keep pupils, students and staff

2500 safe whilst learning remotely, [safeguarding in schools colleges and other providers](#) and [safeguarding](#)

2501 [and remote education](#). The NSPCC also provide helpful advice - [Undertaking remote teaching safely](#).

2502 NSPCC Learning - [Undertaking remote teaching safely during school closures](#).

2503 9.67. Schools and colleges are likely to be in regular contact with parents and carers. Those communications

2504 should be used to reinforce the importance of children being safe online and parents and carers are

2505 likely to find it helpful to understand what systems schools and colleges use to filter and monitor online

2506 use. It will be especially important for parents and carers to be aware of what their children are being

2507 asked to do online, including the sites they will asked to access and be clear who from the school or

2508 college (if anyone) their child is going to be interacting with online

2509

2510

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Filters and monitoring

2514 9.68. Whilst considering their responsibility to safeguard and promote the welfare of children and provide
2515 them with a safe environment in which to learn, governance boards and proprietor should be doing
2516 all that they reasonably can to limit children's exposure to the above risks from the school's or college's
2517 IT system. As part of this process, governance boards and proprietor should ensure their school or
2518 college has appropriate filters and monitoring systems in place. Governance boards and proprietor
2519 should consider the age range of their children, the number of children, how often they access the IT
2520 system and the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech
2521 IT team and seek advice and support required.

2522 9.69. The appropriateness of any filters and monitoring systems are a matter for individual schools and
2523 colleges and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK
2524 Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might
2525 look like UK Safer Internet Centre: [appropriate filtering and monitoring](#).

2526

Information security and access management

2527 9.70. Education settings are directly responsible for ensuring they have the appropriate level of security
2528 protection procedures in place, in order to safeguard their systems, staff and learners and review the
2529 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
2530 Guidance on e-security is available from the National Education Network. In addition, broader
2531 guidance on cyber security including considerations for governors and trustees can be found at
2532 NCSC.GOV.UK.

2533

Reviewing online safety

2534 9.71. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should
2535 consider carrying out an annual review of their approach to online safety, supported by an annual risk
2536 assessment that considers and reflects the risks their children face. A free online safety self-review tool
2537 for schools can be found via the [360 safe website](#).

2538 9.72. UKCIS has published [online safety in schools and colleges: Questions from the governing board](#). The
2539 questions can be used to gain a basic understanding of the current approach to keeping children safe
2540 online; learn how to improve this approach where appropriate; and find out about tools, which can be
2541 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors
2542 of trainee teachers and newly qualified teachers induct mentees and provide ongoing support,
2543 development and monitoring.

2544

Cyberbullying

2545 9.73. Central to Anti-bullying policy is the principle that 'bullying is always unacceptable' and that 'all
2546 children/young people have a right not to be bullied'. School/colleges also recognises that it must take
2547 note of bullying perpetrated outside school/college which spills over into the school/college; therefore
2548 once aware services will respond to any cyber-bullying we become aware of carried out by
2549 children/young people when they are away from the site.

2550 9.74. Cyber-bullying is defined as 'an aggressive, intentional act carried out by a group or individual using
2551 electronic forms of contact repeatedly over time against a victim who cannot easily defend
2552 himself/herself.'

- 2553 • By cyber-bullying, we mean bullying by electronic media:
- 2554 • Bullying by texts or messages or calls on mobile 'phones
- 2555 • The use of mobile 'phone cameras to cause distress, fear or humiliation
- 2556 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,
- 2557 personal websites, social networking sites
- 2558 • Using e-mail to message others

- | | |
|------|---|
| 2559 | • Hijacking/cloning e-mail accounts |
| 2560 | • Making threatening, abusive, defamatory or humiliating remarks in on-line forums |
| 2561 | 9.75. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate |
| 2562 | defamatory information in any media including internet sites. |
| 2563 | 9.76. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public |
| 2564 | electronic communications network, a message or other matter that is grossly offensive or one of an |
| 2565 | indecent, obscene or menacing character. |
| 2566 | 9.77. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of |
| 2567 | conduct amounting to harassment. |
| 2568 | 9.78. If services become aware of any incidents of cyberbullying, they will need to consider each case |
| 2569 | individually as to any criminal act that may have been committed. The services will pass on information |
| 2570 | to the police if it feels that it is appropriate or is required to do so. |

2571

- 2572 9.79. Online gaming is an activity in which the majority of children and young people and many adults get
2573 involved. The services will raise awareness by talking to children/young people/key workers/staff and
2574 also where appropriate parents/carers involved about the games their children play and help them
2575 identify whether they are appropriate.

2576

- 2577 9.80. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or
2578 others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones,
2579 and laptops - any device that enables the sharing of media and messages. Sexting may also be called:
2580 trading nudes, dirties, pic for pic.

- 2581 9.81. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the
2582 person doing it is a child. A young person is breaking the law if they:

- | | |
|------|---|
| 2583 | • take an explicit photo or video of themselves or a friend |
| 2584 | • share an explicit image or video of a child, even if it's shared between children of the same age |
| 2585 | • possess, download or store an explicit image or video of a child, even if the child gave their |
| 2586 | permission for it to be created. |

- 2587 9.82. However, if a young person is found creating or sharing images, the police can choose to record that
2588 a crime has been committed but that taking formal action isn't in the public interest. There are many
2589 reasons why a young person may want to send a naked or semi-naked picture, video or message to
2590 someone else:

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

2598 9.83. The risks of sexting are that the young person has no control over the images and how these are
 2599 shared, and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group
 2600 will provide education and guidance to prevent individuals from becoming victims of such situations
 2601 by encouraging them to think about the risk of sexting and understand how to seek help when
 2602 approached to take part in sexting. More information can be found on [Keeping-children-safe/online-](#)
 2603 [safety/sexting-sending-nudes](#).

2604 Online reputation

2605 9.84. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed
 2606 by posts, photos that have been uploaded and comments made by others on people's profiles. It is
 2607 important that children/young people and staff are aware that anything that is posted could influence
 2608 their future professional reputation. The majority of organisations and work establishments now check
 2609 digital footprint before considering applications for positions or places on courses.

2610 Grooming

2611 9.85. On-line grooming is the process by which one person with an inappropriate sexual interest in
 2612 children/young people will approach a child/young person on-line, with the intention of developing a
 2613 relationship with that child/young person, to be able to meet them in person and intentionally cause
 2614 harm.

2615 9.86. The services will build awareness amongst children/young people, parents/carers and staff about
 2616 ensuring that the child/young person:

- 2617 • Only has friends on-line that they know in real life
- 2618 • Is aware that if they communicate with somebody that they have met on-line, that relationship
 2619 should stay on-line.

2620 9.87. Where appropriate that the services will support parents/carers to:

- 2621 • Recognise the signs of grooming
- 2622 • Have regular conversations with their children/young people about on-line activity and how to stay
 2623 safe on-line

2624 9.88. Where appropriate the services will raise awareness by:

- 2625 • Regular communication with the families
- 2626 • Schools/colleges will include awareness around grooming as part of their curriculum
- 2627 • Identifying with the families and children/young people how they can be safeguarded against
 2628 grooming.

2629 Violence against women and girls (VAWG)

2630 9.89. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of
 2631 women and girls. The government has a strategy looking at specific issues that women and girls face.

2632 9.90. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier
 2633 to equal participation of women and men in social, economic, and political spheres. Such violence
 2634 impedes gender equality and the achievement of a range of development outcomes. VAWG is a
 2635 complex and multifaceted problem that cannot effectively be addressed from a single vantage point.
 2636 The prevention of and response to such violence require coordinated action across multiple sectors.
 2637

2638 Female genital mutilation (FGM)

2639 9.91. FGM comprises all procedures involving partial or total removal of the external female genitalia or other
2640 injury to the female genital organs for non-medical reasons, hence interferes with the natural function
2641 of girls and women's bodies. It has no health benefits and harms girls and women in many ways.

2642 9.92. The age at which girls undergo FGM varies enormously according to the community in which they live.
2643 The procedure may be carried out when the girl is new born, during childhood or adolescence, just
2644 before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to
2645 take place between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher
2646 risk.

2647 9.93. In 2003, FGM became a criminal offence for UK nationals or permanent UK residents to take their child
2648 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty
2649 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

2650 **Forced marriage**

2651 9.94. In the case of children and young people: 'a forced marriage is a marriage in which one or both
2652 spouses cannot consent to the marriage and duress is involved. Duress can include physical,
2653 psychological, financial, sexual and emotional pressure.' In developing countries, approx. 11% of girls
2654 are married before the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2655 9.95. It is important that all members of staff recognise the presenting symptoms, know how to respond if
2656 there are concerns and where to turn for advice.

2657 9.96. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**
2658 and locally through the local police safeguarding team or children's social care.

2659 9.97. While all members of staff (education, care, clinical) have important responsibilities with regard to
2660 children, young people or adults who may be at risk of forced marriage, managers and leaders should
2661 not undertake roles in this regard that are most appropriately discharged by other children's services
2662 professionals such as police officers or social workers.

2663 9.98. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of
2664 forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency
2665 statutory guidance for dealing with forced marriage, which can both be found at
2666 [https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-](https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage)
2667 [marriage](https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage). School and college staff can contact the Forced Marriage Unit if they need advice or
2668 information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

2669 **Breast ironing**

2670 9.99. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's
2671 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically
2672 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and
2673 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue
2674 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where
2675 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports
2676 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used
2677 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2678 9.100. Any suspected cases of breast ironing **MUST** be reported immediately under this Child Protection and
2679 Safeguarding policy and the Individual offered medical help.

2680 **Teenage relationship abuse**

2681 9.101. Research has shown that teenagers don't readily understand what constitutes abusive behaviour such
2682 as controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone,
2683 telling them what to wear, who they can/can't see or speak to and that this abuse is prevalent within
2684 teen relationships.

2685 9.102. Further research shows that teenagers don't understand what consent means within their
2686 relationships. They often hold the common misconception that rape can only be committed by a
2687 stranger down a dark alley and don't understand that it could happen within their own relationships.
2688 This can lead to these abusive behaviours feeling 'normal' and therefore unchallenged, as they are not
2689 recognised as being 'abusive'.

2690 9.103. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of
2691 their own, their peers or others behaviour towards them. Therefore, significant effort will be made to
2692 raise awareness of it and respond effectively to such situations.

2693 9.104. In response to this Cambian Group will provide education and guidance to prevent teenagers from
2694 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views
2695 of violence, abuse and controlling behaviours, and understand what consent means within
2696 relationships.

2697 Honour-based violence

2698 9.105. It is often linked to family members or acquaintances who mistakenly believe someone has brought
2699 shame to their family or community by doing something that is not in keeping with the traditional beliefs
2700 of their culture. However, abuse committed in the context of preserving "honour" often involves a wider
2701 network of family or community pressure and can include multiple perpetrators. It is important to be
2702 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to
2703 take" for example, honour-based violence might be committed against individuals who:

- 2704 • become involved with a boyfriend or girlfriend from a different culture or religion
- 2705 • want to get out of an arranged marriage
- 2706 • want to get out of a forced marriage
- 2707 • wear clothes or take part in activities that might not be considered traditional within a particular
2708 culture.

2709 9.106. Girls and women are the most common victims of honour-based violence however; it can also affect
2710 men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of
2711 'honour' might include: domestic abuse, threats of violence, assault, sexual or psychological abuse,
2712 forced marriage, being held against their will or taken somewhere they don't want to go.

2713 9.107. If staff believe that the Individual is at risk from honour-based violence, the DSL will follow the usual
2714 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual
2715 is at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on
2716 teachers. It is important that if honour-based violence is known or suspected, communities and family
2717 members must NOT be contacted prior to referral to the police or social care as this could increase the
2718 risk to the individual.

2719 Preventing extremism and radicalisation

2720 9.108. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism
2721 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**
2722 **Extremism and Radicalisation policy** and **0.27 E-safety policy**, we all need to be vigilant in ensuring the
2723 safety from extremist and terrorist material when accessing the internet. We consider Somerset Local
2724 Authority Safeguarding Children's Board arrangements to fulfil its Prevent duties.

2725 9.109. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from
2726 other forms of harms and abuse, protecting children from this risk should be a part of a schools or
2727 colleges' safeguarding approach.

- 2728 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy,
2729 the rule of law, individual liberty and the mutual respect and tolerance of different faiths and
2730 beliefs. This also includes calling for the death of members of the armed forces.

2731 • **Radicalisation** refers to the process by which a person comes to support terrorism and
2732 extremist ideologies associated with terrorist groups.

2733 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes
2734 serious damage to property; or seriously interferes or disrupts an electronic system. The use
2735 or threat **must** be designed to influence the government or to intimidate the public and is
2736 made for the purpose of advancing a political, religious or ideological cause.

2737 9.110. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
2738 Background factors combined with specific influences such as family and friends may contribute to a
2739 child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social
2740 media or the internet) and settings (such as within the home).

2741 9.111. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent
2742 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert
2743 to changes in children's behaviour, which could indicate that they may be in need of help or protection.
2744 Staff should use their judgement in identifying children who might be at risk of radicalisation and act
2745 proportionately which may include making a Prevent referral.

2746 9.112. The school's or college's DSL (and any deputies) should be aware of local procedures for making a
2747 Prevent referral

2748 9.113. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security
2749 Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent
2750 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2751 9.114. [An online general awareness-training module on Channel is available](#). The module is suitable for
2752 school staff and other front-line workers. It introduces the topics covered by this advice, including how
2753 to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the
2754 types of intervention that may be appropriate, in addition to Channel.

2755 Prevent Duty

2756 9.115. The Prevent duty should be seen as part of schools and colleges' wider safeguarding obligations. DSLs
2757 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty](#)
2758 [guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with
2759 schools (and also covers childcare). DSLs and other senior leaders in colleges should familiarise
2760 themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The
2761 guidance is set out in terms of four general themes: risk assessment, working in partnership, staff
2762 training, and IT policies.

2763 9.116. Local authorities will be expected to ensure appropriate frontline staff, including those of its contractors,
2764 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into
2765 terrorism and are aware of available programmes to deal with this issue.

2766 9.117. As the independent body responsible for standards and quality improvement for further education, the
2767 Education and Training Foundation will work with the sector to ensure that appropriate training is
2768 available. This will include and draw from training provided through the network of Prevent co-
2769 ordinators.

2770 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

2771 9.118. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2772 9.119. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an
2773 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal
2774 activity, in exchange for something the victim needs or wants, and/or for the financial advantage or
2775 increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE
2776 and CCE can affect children, both male and female and can include children who have been moved
2777 (commonly referred to as trafficking) for the purpose of exploitation.

2778

Child Criminal Exploitation (CCE)

2779 9.120. Some specific forms of CCE can include children being forced or manipulated into transporting drugs
2780 or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can
2781 also be forced or manipulated into committing vehicle crime or threatening/committing serious
2782 violence to others. Children can become trapped by this type of exploitation as perpetrators can
2783 threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be
2784 coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from
2785 harm from others. As children involved in criminal exploitation often commit crimes themselves, their
2786 vulnerability as victims is not always recognised by adults and professionals, (particularly older
2787 children), and they are not treated as victims despite the harm they have experienced. They may still
2788 have been criminally exploited even if the activity appears to be something they have agreed or
2789 consented to.

2790 9.121. It is important to note that the experience of girls who are criminally exploited can be very different to
2791 that of boys. The indicators may not be the same; however, professionals should be aware that girls
2792 are at risk of criminal exploitation too. It is also important to note that both boys and girls being
2793 criminally exploited may be at higher risk of sexual exploitation.

2794

Child Sexual Exploitation (CSE)

2795 9.122. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by
2796 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing,
2797 rubbing, and touching outside clothing. It may include noncontact activities, such as involving children
2798 in the production of sexual images, forcing children to look at sexual images or watch sexual activities,
2799 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for
2800 abuse including via the internet.

2801 9.123. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate
2802 knowledge e.g. through others sharing videos or images of them on social media.

2803 9.124. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and
2804 17 year olds who can legally consent to have sex. Some children may not realise they are being
2805 exploited e.g. they believe they are in a genuine romantic relationship.

2806 9.125. Children with learning difficulties can be particularly vulnerable to exploitation as can children from
2807 particular groups, e.g. looked after children, young carers, children who have a history of physical,
2808 sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol,
2809 children who go missing from home or school, children involved in crime, children with parents/carers
2810 who have mental health problems, learning difficulties/other issues, children who associate with other
2811 children involved in exploitation. However, it is important to recognise that any child can be targeted.

2812 9.126. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors
2813 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or
2814 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants
2815 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator
2816 or facilitator.

2817 9.127. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age
2818 of 18 years, including 16- and 17-year olds who can legally consent to have sex) or adults. It is critical
2819 to know that children/young people may also be exploited by other children/young people, who
2820 themselves may be experiencing exploitation – where this is the case, it is important that the
2821 child/young person perpetrator is also recognised as a victim.

2822 9.128. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic
 2823 to complex organised abuse. It can involve force and/or enticement-based methods of compliance
 2824 and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even
 2825 when activity appears consensual and it should be noted exploitation as well as being physical can be
 2826 facilitated and/or take place online. More information include definitions and indicators are included
 2827 in - [KCSIE2022 - Part One](#). Some of the following can be indicators of both child criminal and sexual
 2828 exploitation where children:

- 2829 • appear with unexplained gifts or new professions;
- 2830 • associate with other young people involved in exploitation;
- 2831 • suffer from changes in emotional well-being;
- 2832 • misuse drugs and alcohol;
- 2833 • go missing for periods of time or regularly or come home late; and
- 2834 • regularly miss school or education or do not take part in education.

2835 9.129. Some additional specific indicators that may be present in CSE and children who:

- 2836 • Children who have older boyfriends or girlfriends; and
- 2837 • Children who suffer from sexually transmitted infections, display sexual behaviours
 2838 beyond expected sexual development or become pregnant.

2839 9.130. Further information on signs of a child's involvement in sexual exploitation is available in Home Office
 2840 guidance: Child sexual exploitation: guide for practitioners.

2841 9.131. As an organisation we do recognise that the same level of exploitation may take place involving
 2842 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged
 2843 18 years or over and at risk of abuse or neglect because of their needs for care and/or support (The
 2844 Care Act 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is
 2845 expected that the above statement will equally apply to those who are 18+ across England and Wales.

2846 9.132. Children under the age of criminal responsibility (under the age of 10), or young people who have
 2847 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into
 2848 criminal activity provide opportunity for criminals to distance themselves from crime.

2849 County Lines

2850 9.133. County lines is a term used to describe gangs and organised criminal networks involved in exporting
 2851 illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen
 2852 locally as well as across the UK - no specified distance of travel is required. Children and vulnerable
 2853 adults are exploited to move, store and sell drugs and money. Offenders will often use coercion,
 2854 intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
 2855 Children can be targeted and recruited. Exploitation is an integral part of the county lines, children may
 2856 become victims through: coercion, intimidation, violence (including sexual) and weapons.

2857 9.134. Children can be targeted and recruited into county lines in a number of locations including schools,
 2858 further and higher educational institutions, pupil referral units, special educational needs schools,
 2859 children's homes and care homes. Children are often recruited to move drugs and money between
 2860 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed
 2861 internally to avoid detection. Children can easily become trapped by this type of exploitation as county
 2862 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their
 2863 families) if they attempt to leave the county lines network.

2864 9.135. Children are also increasingly being targeted and recruited online using social media. Children can
 2865 easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts
 2866 which need to be worked off or threaten serious violence and kidnap towards victims (and their
 2867 families) if they attempt to leave the county lines network. These children and young people are at
 2868 serious risk of criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group
 2869 who may not necessarily be affiliated to a gang, but who have developed networks across
 2870 geographical boundaries to access and exploit existing drugs markets in these areas.

2871 9.136. The group, or individuals exploited by them, travel regularly between the urban hub and the rural
 2872 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug
 2873 supply but is generally more frequent and in smaller deal amounts compared to most other drug
 2874 supply methods.

2875 9.137. A number of the indicators for CSE and CCE as detailed above may be applicable to where children
 2876 are involved in county lines. Some additional specific indicators that may be present where a child is
 2877 criminally exploited through involvement in county lines are children who:

- 2878 • go missing and are subsequently found in areas away from their home;
- 2879 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 2880 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and
 2881 collecting money for drugs;
- 2882 • are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid
 2883 detection;
- 2884 • are found in accommodation that they have no connection with, often called a 'trap house or
 2885 cuckooing' or hotel room where there is drug activity;
- 2886 • owe a 'debt bond' to their exploiters;
- 2887 • have their bank accounts used to facilitate drug dealing.

2888 9.138. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be
 2889 considered alongside consideration of availability of local services/third sector providers who offer
 2890 support to victims of county lines exploitation.

2891 9.139. Further information on the signs of a child's involvement in county lines is available in guidance
 2892 published by the [Home Office and The Children's Society County Lines Toolkit for Professional](#).

2893 Cuckooing

2894 9.140. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation
 2895 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to
 2896 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to
 2897 as cuckooing.

2898 9.141. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order
 2899 to use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common
 2900 problem in the South of England. The crime is named for the cuckoo's practice of taking over other
 2901 birds' nests for its young.

2902 9.142. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and
 2903 firearms.

2904 9.143. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally
 2905 exploited include:

- 2906 ▪ Increase in missing episodes (Education and/or Care) – particular key as
 2907 children/young people can be missing for days and drug run in other counties

- 2908
2909
- Having unexplained amounts of money, new high cost items and multiple mobile phones
- 2910
- Increased social media and phone/text use, almost always secretly
- 2911
- Older males in particular seen to be hanging around and driving
- 2912
- Having injuries that are unexplained and unwilling to be looked at
- 2913
- Increase in aggression, violence and fighting
- 2914
- Carrying weapons – knives, baseball bats, hammers, acid
- 2915
- Travel receipts that are unexplained
- 2916
2917
- Significant missing cases from education and disengaging from previous positive peer groups
- 2918
2919
- Parents/carers concerns and significant changes in behaviour that affect emotional wellbeing
- 2920 9.144. We will treat any child/young person who may be criminally exploited as a victim in the first instance
2921 and refer to the Local Safeguarding Authority in the first instance. If a referral to the police is also
2922 required as crimes have been committed on the school premises, these will also be made.
- 2923 **Knife crime**
- 2924 9.145. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes
2925 references to both; to the use of knives against children either to threaten or to wound them and to
2926 instances when children may have been carrying or using knives for a range of purposes.
- 2927 9.146. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults
2928 and knife-carrying. However, there are many different criminal offences relating to knives. For example:
- 2929
- it is an offence to threaten or cause harm to a person with a bladed weapon
- 2930
- some bladed weapons are prohibited from being sold or purchased, including to anyone
2931 under the age of 18
- 2932
- offences such as robbery or assault can be aggravated if a knife is involved
- 2933
- it is also an offence to carry a knife in a public place without good reason.
- 2934
- It is clear that knife crime is an increasing safeguarding risk to children and young people,
2935 both at school and in their local communities. While Ofsted have not sought to answer
2936 the question of the causes of knife crime, leaders told Ofsted that, in their experience,
2937 children are in three categories of risk of knife carrying.
- 2938 9.147. The highest level of risk is for those children who have been groomed into gangs, for the purposes of
2939 criminal exploitation.
- 2940 9.148. Underneath this lies a group of children who have witnessed other children carrying knives, have been
2941 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition
2942 or who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and
2943 knives on social media.
- 2944 9.149. Then there are children who carry knives to school as an isolated incident. For example, they may carry
2945 a penknife that a grandparent has gifted them
- 2946 9.150. It is important to remember that knife crime does not exist in a vacuum and children who are victims
2947 or perpetrators may also be experiencing multiple vulnerabilities.

2948 9.151. Some children and young people can be more at risk of being drawn into criminality; multiple studies
2949 demonstrate a clear link between inequality and high rates of violence for example. There is a need to
2950 both understand and address individual risk factors as well as address the social challenges that
2951 underpin criminal exploitation and serious violence in our communities, from poor mental health,
2952 addiction, poverty, unemployment and poor-quality housing.

2953 **Missing young people and the link between missing and county lines**

2954 9.152. Every precaution is taken through the use of risk assessments and thorough planning and supervision
2955 to ensure that children, young people and young adults are safe both at school, college, home, and
2956 on outings. If a child, young person or young adult goes missing from our Location, it is considered a
2957 potential indicator of abuse or neglect.

2958 9.153. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of
2959 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to
2960 attend school regularly or has been absent without the school's permission for a continuous period of
2961 10 days or more or as such intervals agreed with the Local Authority. It is essential that all staff are
2962 alert to signs such as travelling to conflict zones, FGM and forced marriage.

2963 9.154. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them
2964 towards going missing and becoming involved in criminal activities. Some individuals may be pulled
2965 towards exploitation through the promise of money, gifts, affection and status. However, they may be
2966 then be forced to work for these people as they are coerced into believing that they are indebted to
2967 them.

2968 **Domestic abuse**

2969 9.155. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever
2970 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as
2971 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of
2972 domestic abuse, based on the previous cross-government definition, ensures that different types of
2973 relationships are captured, including ex-partners and family members. The definition captures a range
2974 of different abusive behaviours, including physical, emotional and economic abuse and coercive and
2975 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the
2976 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as
2977 defined in section 2 of the 2021 Act).

2978 9.156. Types of domestic abuse include intimate partner violence, abuse by family members, teenage
2979 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of
2980 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background
2981 and domestic abuse can take place inside or outside of the home.

2982 9.157. All children can witness and be adversely affected by domestic abuse in the context of their home life
2983 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence
2984 can have a serious, long lasting emotional and psychological impact on children. In some cases, a
2985 child may blame themselves for the abuse or may have had to leave the family home as a result.

2986 9.158. Young people can also experience domestic abuse within their own intimate relationships. This form
2987 of abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young
2988 people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or
2989 both parties are under 16). However, as with any child under 18, where there are concerns about safety
2990 or welfare, child safeguarding procedures should be followed and both young victims and young
2991 perpetrators should be offered support.

2992 9.159. KCSIE2022 introduces additional information about domestic abuse which can encompass a wide
2993 range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is
2994 not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of
2995 domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer
2996 domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have
2997 a detrimental and long-term impact on their health, well-being, development, and ability to learn.

2998 9.160. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work
 2999 together to provide emotional and practical help to children. The system ensures that when police are
 3000 called to an incident of domestic abuse, where there are children in the household who have
 3001 experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before
 3002 the child or children arrive at school the following day. This ensures that the school has up to date
 3003 relevant information about the child's circumstances and can enable immediate support to be put in
 3004 place, according to the child's needs. Operation Encompass does not replace statutory safeguarding
 3005 procedures. Where appropriate, the police and/or schools should make a referral to children's social
 3006 care if they are concerned about a child's welfare. More information about the scheme and how
 3007 schools can become involved is available on the Operation Encompass website.

3008 9.161. Operation Encompass provides an advice and helpline service for all staff members from educational
 3009 settings who may be concerned about children who have experienced domestic abuse. The helpline
 3010 is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

3011 9.162. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in
 3012 confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential
 3013 victims, as well as those who are worried about friends and loved ones. It also has a form through
 3014 which a safe time from the team for a call can be booked. Additional advice on identifying children
 3015 who are affected by domestic abuse and how they can be helped is available at:

- 3016 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 3017 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 3018 • [Saflives: young people and domestic abuse.](#)
- 3019 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes
 3020 information for adult victims, young people facing abuse in their own relationships and
 3021 parents experiencing child to parent violence/abuse)
- 3022 • Home : [Operation Encompass](#) (includes information for schools on the impact of
 3023 domestic abuse on children)

3024 Serious Violent Crime

3025 9.163. All staff should be aware of indicators, which may signal that children are at risk from, or are involved
 3026 with serious violent crime. These may include:

- 3027 • increased absence from school with a significant decline in performance,
- 3028 • a change in friendships or relationships with older individuals or group,
- 3029 • signs of self-harm or a significant change in well-being, or signs of assault or
 3030 unexplained injuries,
- 3031 • unexplained gifts or new possessions could also indicate that children have been
 3032 approached by, or are involved with individuals associated with criminal networks
 3033 or gangs.

3034 9.164. All staff should be aware of the associated risks and understand the measures in place to measure
 3035 these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and
 3036 gang involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance](#)
 3037 [- September 2018](#).

3038 Mental Health

3039 9.165. Schools, colleges and homes have an important role to play in supporting the mental health and
 3040 wellbeing of young people. All staff should be aware that mental health problems can, in some cases,
 3041 be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- 3042 9.166. Schools/colleges and homes need to ensure they have clear systems and processes in place for
3043 identifying possible mental health problems, including routes to escalate and clear referral and
3044 accountability systems.
- 3045 9.167. The Department is providing funding to support costs of a significant training program for senior mental
3046 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will
3047 be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole
3048 school or college approach to mental health.
- 3049 9.168. Only appropriately, trained professionals should attempt to make a diagnosis of a mental health
3050 problem. Staff however, are well placed to observe children day-to-day and identify those whose
3051 behaviour suggests that they may be experiencing a mental health problem or be at risk of developing
3052 one. If staff suspect this might be the case they should report their concerns to a senior leader within
3053 the school and if possible bring their concerns to a member of the clinical team.
- 3054 9.169. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood
3055 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It
3056 is key that staff receive appropriate education and training so that they are aware of how these
3057 children's experiences, can impact on their mental health, behaviour and education.
- 3058 9.170. If staff have a mental health concern about a child that is also a safeguarding concern, immediate
3059 action should be taken. Staff should follow their child protection policy and speak immediately to the
3060 DSL.
- 3061 9.171. Schools and colleges can access a range of advice to help them identify children in need of extra
3062 mental health support; this includes working with external agencies. More information can be found
3063 in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance
3064 as best practice. Public Health England has produced a range of resources to support secondary school
3065 teachers to promote positive health, wellbeing and resilience among children.
- 3066 9.172. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be
3067 useful for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out
3068 how schools and colleges can help prevent mental health problems by promoting resilience as part of
3069 an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to
3070 the needs of their pupils.
- 3071 9.173. In addition, Public Health England has produced a range of resources to support secondary schools to
3072 promote positive health, wellbeing and resilience among children including its guidance Promoting
3073 children and young people's emotional health and wellbeing. Its resources include social media,
3074 forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson
3075 plans. The Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which
3076 provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits
3077 alongside our [Wellbeing for education recovery program](#) content, which covers issues such as
3078 bereavement, loss, anxiety, stress and trauma.
- 3079 **Human trafficking**
- 3080 9.174. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a
3081 process that is a combination of:
- 3082 - Movement (including within the UK);
 - 3083 - Control, through harm / threat of harm or fraud
 - 3084 - For the purpose of exploitation
- 3085 9.175. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming
3086 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a
3087 life of abuse, servitude and inhumane treatment.

3088 9.176. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is
3089 significant evidence that children/young people/young adults (both of UK and other citizenship) are
3090 being trafficked internally within the UK and this is regarded as a more common form of trafficking in
3091 the UK.

3092 9.177. There are a number of indicators which suggest that a child/young person/young adult may have
3093 been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are
3094 as follows:

- 3095 - Shows signs of physical or sexual abuse, and/or has contracted a sexually
3096 transmitted infection or has an unwanted pregnancy
- 3097 - Has a history with missing links and unexplained moves
- 3098 - Is required to earn a minimum amount of money every day
- 3099 - Works in various locations
- 3100 - Has limited freedom of movement
- 3101 - Appears to be missing for periods
- 3102 - Is known to beg for money
- 3103 - Is being cared for by adult/s who are not their parents and the quality of the
3104 relationship between the child and their adult carers is not good
- 3105 - Is one among a number of unrelated children found at one address
- 3106 - Has not been registered with or attended a GP practice
- 3107 - Is excessively afraid of being deported.

3108 9.178. For those children/young people/young adults who are internally trafficked within the UK indicators
3109 include:

- 3110 - Physical symptoms (bruising indicating either physical or sexual assault)
- 3111 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 3112 - Reports from reliable sources suggesting the likelihood of involvement in
- 3113 - Sexual exploitation / the child has been seen in places known to be used for sexual
3114 exploitation
- 3115 - Evidence of drug, alcohol or substance misuse
- 3116 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or
3117 borrowing clothing from older people
- 3118 - Relationship with a significantly older partner
- 3119 - Accounts of social activities, expensive clothes, mobile phones or other possessions
3120 with no plausible explanation of the source of necessary funding
- 3121 - Persistently missing, staying out overnight or returning late with no plausible
3122 explanation
- 3123 - Returning after having been missing, looking well cared for despite having not been
3124 at home
- 3125 - Having keys to premises other than those known about

- 3126 - Low self- image, low self-esteem, self-harming behaviour including cutting,
3127 overdosing, eating disorder, promiscuity
- 3128 - Truancy / disengagement with education
- 3129 - Entering or leaving vehicles driven by unknown adults
- 3130 - Going missing and being found in areas where the child/young person/young adult
3131 has no known links; and/or
- 3132 - Possible inappropriate use of the internet and forming on-line relationships,
3133 particularly with adults/other adults.

3134 9.179. These behaviours themselves do not indicate that an Individual is being trafficked, but should be
3135 considered as indicators that this may be the case.

3136 **Child abduction and community safety incidents**

3137 9.180. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal
3138 responsibility for the child. Child abduction can be committed by parents or other family members; by
3139 people known but not related to the victim (such as neighbours, friends and acquaintances); and by
3140 strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst
3141 children and parents, for example, people loitering nearby or unknown adults engaging children in
3142 conversation.

3143 9.181. As children get older and are granted more independence (for example, as they start walking to school
3144 on their own), it is important they are given practical advice on how to keep themselves safe. Many
3145 schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that
3146 lessons focus on building children's confidence and abilities rather than simply warning them about all
3147 strangers. Further information is available at: <http://www.actionagainstabduction.org/> and
3148 <https://clevernevergoes.org/>

3149 **Modern slavery and the National Referral Mechanism**

3150 9.182. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory
3151 labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery,
3152 servitude, forced criminality and the removal of organs.

3153 9.183. When considering modern slavery, there is a perception that this is taking place overseas. The
3154 government estimates that tens of thousands of slaves are in the UK today.

3155 9.184. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,
3156 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from
3157 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also
3158 been rescued within the UK.

3159 9.185. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be
3160 reported to the DSL/RM/Head of College for referral to be considered to local Safeguarding Authority.

3161 9.186. Further information on the signs that someone may be a victim of modern slavery, the support available
3162 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
3163 Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

3164 **Cybercrime**

3165 9.187. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised
3166 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-
3167 line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent
3168 crimes include:

- 3169 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's
3170 computer network to look for test paper answers or change grades awarded;
- 3171 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,
3172 network or website unavailable by overwhelming it with internet traffic from multiple sources;
3173 and
- 3174 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,
3175 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,
3176 including those above.

3177 9.188. Children with particular skill and interest in computing and technology may inadvertently or deliberately
3178 stray into cyber-dependent crime.

3179 9.189. If there are concerns about a child in this area, the DSL, should consider referring into the Cyber Choices
3180 programme. This is a nationwide police programme supported by the Home Office and led by the
3181 National Crime Agency, working with regional and local policing. It aims to intervene where young
3182 people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert
3183 them to a more positive use of their skills and interests.

3184 9.190. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of
3185 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-
3186 line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When](#)
3187 [to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

3188 Initiation/Hazing

3189 9.191. Hazing is a form of initiation ceremony, which is used to induct newcomers into an organisation such
3190 as a private school, sports team etc. There are a number of different forms, from relatively mild rituals
3191 to severe and sometimes violent ceremonies in gangs/criminal groups.

3192 9.192. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials,
3193 which promote a bond between them. After the hazing is over, the newcomers also have something
3194 in common with older members of the organisation, because they all experienced it as part of a rite of
3195 passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

3196 9.193. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour
3197 and raise awareness of such within all services.
3198

3199 Safeguarding issues relating to Individual children and young people needs

3200 Homelessness

3201 9.194. As an organisation we recognise that being homeless or being at risk of becoming homeless presents
3202 a real risk to a child's/young person welfare. The impact of losing a place of safety and security can
3203 affect an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress
3204 concerns at the earliest opportunity.

3205 9.195. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing
3206 Authority for the parent/guardians in order to raise/progress concerns.

3207 9.196. In most cases school and college, colleagues will be considering homelessness in the context of
3208 children who live with their families, and intervention will be on that basis. However, it should also be
3209 recognised in some cases 16 and 17 year olds could be living independently from their parents or
3210 guardians, for example through their exclusion from the family home, or other reasons. This will require
3211 a different level of intervention and support. Children's services will be the lead agency for these young
3212 people and the DSL should ensure appropriate referrals are made based on the child's circumstances.
3213 The department and the Ministry of Housing, Communities and Local Government have published joint
3214 statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless
3215 and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3216 9.197. Guidance on how local authorities should exercise their homelessness functions in accordance with
3217 the Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local](#)
3218 [authorities](#).

3219 9.198. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young
3220 people and the DSL should ensure appropriate referrals are made based on the Individual's
3221 circumstances.

3222 9.199. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be
3223 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding
3224 Authority where an Individual has been harmed or is at risk of harm.

3225 **Private Fostering**

3226 9.200. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be
3227 cared for by another adult who is not closely related and is not a legal guardian with parental
3228 responsibility for 28 days or more.

3229 9.201. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,
3230 uncle or aunt.

3231 9.202. The Law requires that the carers and parents must notify the Children's Services Department of any
3232 private fostering arrangement.

3233 9.203. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person
3234 is being privately fostered they will inform the Children's Services Department and inform both the
3235 parents and carers that they have done so.

3236 **Child and the Court System**

3237 9.204. As an organisation we recognise that children/young people are sometimes required to give evidence
3238 in criminal courts, either for crimes committed against them or for crimes, they have witnessed. We
3239 know that this can be a stressful experience and therefore services across the organisation will aim to
3240 support children through this process.

3241 9.205. Along with information, advice and guidance, services will use age-appropriate materials published
3242 by HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it
3243 means to be a witness, how to give evidence and the special measures which are in place to assist
3244 such as using a live link/aids to communicate and video links.

3245 9.206. We recognise that making child arrangements via the family courts following separation can be
3246 stressful and entrench conflict in families. This can be very stressful for children. Services will support
3247 children/young people going through this process.

3248 9.207. Alongside information, advice and guidance services will use online materials published by The
3249 Ministry of Justice (2018) which offers children/young people information & advice on the dispute
3250 resolution service - [Get help with child arrangements](#). These materials will also be offered to parents
3251 and carers if appropriate.

3252 9.208. Ensure that children/young people are sufficiently supported where a parent has been sent to prison;
3253 adequate support includes protection from stigma, isolation and poor mental health.

3254 **Fabricated or induced illnesses (FI)**

3255 9.209. Fabricated or induced illness (FI) is a rare form of child abuse. It occurs when a parent or carer, usually
3256 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3257 9.210. FI is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's
3258 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3259 9.211. FI covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child.
3260 This ranges from extreme neglect (failing to seek medical care) to induced illness.

3261 9.212. Behaviours in FI include a parent/carer who:

- 3262 • persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3263 • exaggerates or lies about their child's symptoms,
- 3264 • manipulates test results to suggest the presence of illness – for example, by putting glucose in
- 3265 urine samples to suggest the child has diabetes,
- 3266 • deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary
- 3267 medication or other substances.
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