

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

Bletchley Park School

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93 1. Monitoring and review

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

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

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

100
101 Signed:



Jeremy Wiles
Group Executive Director- Children's Services
Date: August 2023



Laura Sharman

Headteacher
September 2023

102

103 2. Terminology

104 2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as
105 follows:

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‘Establishment’ or ‘Location’	This is a generic term, which means the Children’s Home/school/college.
Individual	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Bletchley Park School we have young people attending our school between the ages of 7 and 19 years.
Head of Service	This is the senior person with overall responsibility for the school. At Bletchley Park School this is the Headteacher, Laura Sharman.
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 Deputy	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
CambianKPI	The online in-house information system, which holds data for each site on quality measures.

113

114 3. Definitions and age-related arrangements

115 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies
116 to children and young people until they reach the age of 18, Keeping Children Safe in Education (2023)
117 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)
118 Act 2021.

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

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

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

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

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

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

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

142 3.7. Children's Social Care - provide support to children in need of help and protection, including children with
143 disabilities. Services include statutory assessment and care planning for children at risk of significant
144 harm, provision for cared for children and care experienced young people, as well as fostering and
145 adoption services.

146 3.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governance
147 boards and proprietor should ensure that the school or college contributes to multi-agency working in
148 line with statutory guidance [Working Together to Safeguard Children](#).

149 3.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area
150 within the local authority and the chief officer of police for an area (any part of which falls)) within the
151 local authority work together with appropriate relevant agencies to safeguard and promote the welfare
152 of local children, including identifying and responding to their needs.

153 3.10. It is especially important that schools and colleges understand their role in the three safeguarding partner
154 arrangements. Governance boards, proprietor and their senior leadership teams, especially their DSLs,
155 should make themselves aware of and follow their local arrangements.

156 3.11. The three safeguarding partners should allow all schools and colleges in the local area to be fully engaged,
157 involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding
158 partners will name schools and colleges as relevant agencies and will reach their own conclusions on the
159 best way to achieve the active engagement with individual institutions in a meaningful way.

160 Child protection definition

161 3.12. Child protection is part of the safeguarding process. It focuses on protecting individual children identified
162 as suffering or likely to suffer significant harm. This includes child protection procedures, which detail
163 how to respond to concerns about a child.

164 Safeguarding definition – Working together to safeguarding children 2018

165 3.13. **Safeguarding children and young people** is the action taken to promote the welfare of children and
166 protect them from harm. It means:

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

171 Safeguarding definition – Keeping Children Safe in Education 2023

172 3.14. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes
173 into contact with children and their families has a role to play. In order to fulfil this responsibility

effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

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

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

Safeguarding Adults

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

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

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

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

The difference between safeguarding and child protection

3.19. 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

3.20. 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.

3.21. 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

217 mutilation and through online social media. See **Appendix 12 - Further safeguarding information – what**
218 **everyone needs to know.**

219 3.22. In the context of an adult, abuse is a violation of a person’s human and civil rights by another person or
220 persons and may result in significant harm to, or the exploitation of, the person subjected to it.

221 3.23. In addition to the types of abuse mentioned in **Appendix 4 – Types of abuse - Children**, there are other
222 forms of abuse in relation to adults explained in more detail in **Appendix 5 – Types of abuse – Adults.**

223 3.24. Abuse can happen anywhere: for example, in someone’s own home, in a public place, in hospital, in a
224 care home, school or in a college. It can happen when someone lives alone or with others. Anyone can
225 carry out abuse or neglect. Abuse can be intentional or unintentional; it may be a single act or repeated
226 acts.

227 **4. Purpose**

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

230 4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance**, and it complies
231 with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information**
232 **Poster**. This policy complies with MKSCB, NSCB, Bucks LSCB, HSCP, Central Beds LSCB, Bedfordshire LSCB,
233 Luton SCB and Oxford SCB’s locally agreed procedures. Printed or electronic copies of the Local
234 Safeguarding Children’s Partnerships (LSCP), Local Safeguarding Adults Board (LSAB) are available in every
235 setting.

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

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

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

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

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

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

251 **5. Policy**

252Safeguarding culture of the organisation

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

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

- 258 children's and young people's capacity around the risks and their own safety, regular reflective
259 supervision).
- 260 - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other
261 professionals in timely manner, active listening, applying theory in practice in a methodical
262 way).
- 263 - **Reflective** (understanding 'how we got there in the first place', completing a reflective account
264 of events, involving other key professionals in future planning, identifying actions and further
265 changes to be made).
- 266 5.2. Child protection and safeguarding is everyone's responsibility. Everyone working for or visiting our
267 locations has a responsibility to understand and implement this policy and procedure at all times.
- 268 5.3. All individuals in our services have a right to feel safe, secure and be protected from harm.
- 269 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all
270 individuals with special educational needs (SEN) and disabilities:
- 271 • Are more likely to be abused or neglected;
 - 272 • May display behaviour, mood and/or injury, which may relate to possible abuse and not just
273 their SEN or a particular disability.
 - 274 • Have a higher risk of peer group isolation.
 - 275 • Can be disproportionally impacted by things like bullying without outwardly showing any signs.
 - 276 • Experience communication barriers and difficulties in overcoming these barriers.
- 277 5.5. The most common reason for children or young people being looked after is as a result of abuse/neglect.
278 We will ensure all staff have the skills, knowledge and understanding to help keep children and young
279 people safe.
- 280 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or
281 disclosure that may indicate an individual is at risk of harm, either in the school, college, and care home
282 or in the community, taking into account contextual safeguarding, see **Appendix 12 - Further**
283 **safeguarding information – what everyone need to know** which also contains information related to
284 safeguarding issues related to individual children and young people's needs.
- 285 5.7. We have a duty to help individuals learn how to keep themselves safe and deepen their understanding
286 of safeguarding, through both formal curriculum and informal opportunities.
- 287 5.8. As an organisation, we acknowledge that working in partnership with other agencies protects individuals
288 and reduces risk and so we will engage in partnership, working throughout the child protection process
289 to safeguard children and will equally work through safeguarding adults' procedures as directed by local
290 procedures.
- 291 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance
292 referred to in this document can be found in separate appendices at the end of this document.

293 Divisional Safeguarding Board

- 294 5.10. As an organisation Caretech children's services operates three Divisional Safeguarding Boards: Education,
295 Residential Care and Fostering. The main purpose of each board is to ensure that all services across
296 all divisions discharge their responsibilities effectively for assuring safe and secure services for children
297 and young people, and manage all safeguarding risks appropriately within its own workforce, including

298 direct employees and also the contracted workforce (supply workers/agency/contractor and
299 subcontractors). The full terms of reference for each Board is available on [Cambian Point](#).

300 What staff should read and be aware of

301 5.11. On the 1st September 2023 Keeping Children Safe in Education (2023) guidance replaced Keeping Children
302 Safe in Education 2022. It is essential that everybody working in a school or college understands their
303 safeguarding responsibilities. Staff who work directly with children read at least [Part one](#) of this guidance.
304 Governance Boards and proprietor (or those acting on their behalf) working with their senior leadership
305 teams and especially their designated safeguarding lead, should ensure that those staff who do not work
306 directly with children read either Part one or [Annex A](#) (a condensed version of Part one) of this guidance.

307 5.12. The guidance should be read alongside:

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

311 5.13. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how
312 the learning from KCSIE2023 will take place with their staff. School /college's SLT should ensure that staff
313 complete the KCSIE2023 knowledge check.

314 5.14. All staff should be aware of systems within their school or college, which support safeguarding, and these
315 should be explained to them as part of staff induction. This should include the:

- 316 - Child protection and safeguarding policy
- 317 - Behaviour Support policy
- 318 - Anti bullying policy
- 319 - Whistleblowing policy, Code of conduct and Code of Practice policy
- 320 - Missing from Care policy, local procedure for children missing from education
- 321 - Role of the DSL (including the identity of the DSL and any deputies)
- 322 - Have Access to policies and a copy of Part one of KCSIE2023
- 323 - All staff should be aware of their local early help process and understand their role in it, more
324 information can be found in [Working Together to Safeguard Children 2018](#)
325 [\(publishing.service.gov.uk\)](#).

326 5.15. All staff should be aware of the process for making referrals to children's social care and for statutory
327 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child
328 suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might
329 be expected to play in such assessments.

330 5.16. Schools concerned about a child's/young person's welfare should refer their concern to local authority
331 children's social care where the school is located. If the child is placed at the school by a different LA then
332 the school will need to inform that LA as well. Where a child is suffering, or is likely to suffer from harm,
333 it is important that a referral to children's social care (and if appropriate the police) is made immediately.
334 Referrals should follow the local referral process. Children's homes/care homes should follow their
335 referral process as per their local procedure and contact Safeguarding Partner/Safeguarding Board as per
336 their local Safeguarding procedure.

337 5.17. All staff should know what to do if a child/young person/young adult tells them he/she is being abused,
338 exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate
339 level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a
340 deputy) and children's social care. Staff should never promise a child that they would not tell anyone
341 about a report of any form of abuse, as this might ultimately not be in the best interests of the child.

342 5.18. All staff should be able to reassure victims that they are being taken seriously and that they will be
343 supported and kept safe. A victim should never be given the impression that they are creating a problem

344 by reporting any form of abuse including sexual violence and sexual harassment. Nor should a victim ever
345 be made to feel ashamed for making a report.

346 5.19. It is important to explain that the law is in place to protect children and young people rather than
347 criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

348 5.20. All staff should be aware that children may not feel ready or know how to tell someone that they are
349 being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For
350 example, children may feel embarrassed, humiliated, or being threatened. This could be due to their
351 vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from
352 having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also
353 important that staff determine how best to build trusted relationships with children and young people
354 which facilitate communication.

355 5.21. Staff should **not** assume a colleague, or another professional will act and share information that might be
356 critical in keeping children safe. They should be mindful that early information sharing is vital for the
357 effective identification, assessment, and allocation of appropriate service provision, whether this is when
358 problems first emerge, or where a child is already known to local authority children's social care (such as
359 a child in need or a child with a protection plan).

360 Whole service approach to safeguarding

361 5.22. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or
362 college approach to safeguarding. This means ensuring safeguarding and child protection are at the
363 forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems,
364 processes and policies should operate with the best interests of the child at their heart.

365 5.23. Where there is a safeguarding concern, the child's wishes and feelings must be considered when
366 determining what action to take and what services to provide. Systems should be in place, and they
367 should be well promoted, easily understood and easily accessible for children to confidently report abuse,
368 knowing their concerns will be treated seriously, and knowing they can safely express their views and
369 give feedback.

370 Children with special educational needs and disabilities or physical health issues

371 5.24. Children with special educational needs or disabilities (SEND) or certain health conditions can face
372 additional safeguarding challenges. There might be some additional barriers when recognising abuse and
373 neglect in this group of children. These can include:

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

382 5.25. SEN division and other services where children have/may have SEND should consider extra pastoral
383 support and attention for these children, along with ensuring any appropriate support for communication
384 is in place. Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and](#)
385 [Supporting Pupils at School with Medical Conditions](#).

386 Virtual school heads

387 5.26. Virtual school heads manage pupil premium plus for looked after children. In maintained schools and
388 academies, the designated teacher should work with the virtual school head to discuss how funding can
389 be best used to support the progress of looked after children in the school and meet the needs identified
390 in the child's personal education plan. The designated teacher should also work with the virtual school

head to promote the educational achievement of previously looked after children. In other schools and colleges, an appropriately trained teacher should take the lead. More information can be found in [Designated teacher for looked after and previously looked after children](#) and [Promoting the education of looked after and previously looked after children](#).

6. Procedure

Roles and responsibilities

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



Name: Stephen Doughty

Contact: 07876 791949

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

- 423 and welfare (including online and digital safety) and when deciding whether to make a referral by
424 liaising with relevant agencies so that children's needs are considered holistically.
- 425 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,
426 where safeguarding concerns are linked to mental health.
 - 427 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child
428 or adult) and, where appropriate, the Local Authority Designated Officer (LADO).
 - 429 • Liaise with the headteacher or principal (if they are not the DSL themselves) to inform him or her of
430 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police
431 investigations. This should include being aware of the requirement for children to have an Appropriate
432 Adult. Further information can be found in the statutory guidance - [PACE Code C 2019](#).
 - 433 • As required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for
434 child protection concerns in cases which concern a staff member.
 - 435 • Refer cases to the Channel programme where there is a radicalisation concern as required.
 - 436 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the
437 Disclosure and Barring Service as required; and
 - 438 • Refer cases where a crime may have been committed to the police as required. [NPCC - When to call](#)
439 [the police](#) should help understand when to consider calling the police and what to expect when
440 working with the police.
 - 441 • Act as a source of advice, support and expertise within the location when deciding to make a referral
442 by liaising with relevant agencies.
 - 443 • Help promote educational outcomes by sharing the information about the welfare, safeguarding and
444 child protection issues that children are experiencing, or have experienced, with teachers and school
445 and college leadership staff.
 - 446 • Identify staff safeguarding training needs and organise training for their staff.
 - 447 • Participate in local safeguarding boards when required.
 - 448 • Evaluate and contribute to high standards of safeguarding practice at the location.
 - 449 • Work to ensure that the wellbeing of children and young people is in constant focus and that they are
450 guarded from harm or abuse.
 - 451 • Ensure the child protection and safeguarding policy is available publicly and parents/those with
452 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be
453 made and the role of the school/college/home in this.
 - 454 • Understands the relevant data protection legislation and regulations, especially The Data Protection
455 Act 2018.
- 456 6.5. More details about the role of the DSL including their availability, management of referrals, information
457 sharing, working with others, raising awareness and other can be found in [KCSIE 2023 Annex C - Role of](#)
458 [the DSL](#)
- 459 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where
460 asked do to so. There are arrangements for covering the role of the DSL when Stephen Doughty is
461 unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team
462 lead by a DSL with a number of deputies where required. Our Designated Deputies are Carey Chandler,
463 Karen Truman, Johanna Coker, Michele Nicholas and Rose Pre Kouadio.
- 464
- 465
- 466 6.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected
467 abuse and neglect should be given the highest priority.
- 468 6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and**
469 **Safeguarding at Cambian**.
- 470 6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps
471 to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff
472 must use the correct forms when recording and managing concerns and allegations regarding the abuse

of individuals. Education services must use Behaviour Watch or My Concern systems: Concern/Safeguarding function to record concerns. Where, throughout this policy, references are made to the 'concern form' this means either **25.04 Concern form** which is a word document (part of this policy) or the Behaviour Watch/My Concern– Concern/Safeguarding functionality where the system is being used.

Information sharing and managing the child protection file

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

6.11. Records should include:

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

6.12. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in [KCSIE 2023](#) and [Information sharing advice for safeguarding practitioners](#).

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

LADO referral criteria (KCSIE2023) – meeting the harm threshold

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

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

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

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

6.17. This above information relates to members of staff, supply staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place.

515 Allegations against a teacher who is no longer teaching should be referred to the police. Historical
516 allegations of abuse should also be referred to the police.

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

518 6.18. Many children and young people in our services (education and care) have an allocated social worker due
519 to safeguarding or welfare needs.

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

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

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

533 6.22. Children missing from education, particularly persistently, can act as a vital warning sign to a range of
534 safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county
535 lines. It is important the school or college's response to children missing from education supports
536 identifying such abuse and helps prevent the risk of them going missing in the future. More information
537 can be found in [para 175 of KCSIE 2023](#)

538 **Unexplained body marks**

539 6.23. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,
540 swellings, cuts and scratches which by and large will be as a result of daily activities or for some individuals
541 as a result of self-injurious behaviour. A concern form must be completed for all unexplained marks and
542 physical changes and passed to the DSL (or a deputy) along with copies of the last 3 days of Daily Diary
543 notes and Activity Records. Parents/carers and social workers should always be kept informed. Concern
544 log should be updated with concern and relevant reference number provided to concern.

545 6.24. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the
546 correct course of action for dealing with unexplained body marks.

547 6.25. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no
548 reasonable explanation can be given the DSL must contact the local Safeguarding Authority for further
549 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

550 6.26. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be
551 opened and safeguarding process followed.

552 6.27. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome
553 must be shared with social worker and parents.

554 **Disclosure from an Individual**

555 6.28. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
556 **procedure.**

557 6.29. It is important to note that children/young people may not find it easy to tell staff about their abuse
558 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react
559 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a
560 member of school or college staff may overhear a conversation that suggests a child has been harmed or
561 a child's/young person's own behaviour might indicate that something is wrong. If staff have any

562 concerns about a child's/young person's welfare, they should act on them immediately rather than wait
563 to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**
564 **procedure.**

565 6.30. In case of reports of sexual violence and sexual harassment between children and young people, these
566 are extremely complex to manage. It is essential that victims are protected, offered appropriate support
567 and every effort is made to ensure their education and care is not disrupted. It is also important that
568 other children, young people and staff are supported and protected as appropriate.

569 6.31. The service's initial response to a report from a child is incredibly important. How the staff respond to a
570 report can encourage or undermine the confidence of future victims of sexual violence and sexual
571 harassment to report or come forward.

572 6.32. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.
573 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage
574 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding
575 Authority) to discuss next steps. Staff should only share the report with those people who are necessary
576 in order to progress it. It is important that the victim understands what the next steps will be and whom
577 the report will be passed to.

578 6.33. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and how
579 the report will be progressed, don't ask leading questions and only prompt the child where necessary
580 with open questions – where, when, what, etc. It is important to note that whilst leading questions should
581 be avoided, staff can ask children if they have been harmed and what the nature of that harm was.

582 6.34. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or
583 college staff. It is important that the person to whom the child discloses recognises that the child has
584 placed them in a position of trust. They should be supportive and respectful of the child.

585 6.35. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the report
586 and immediately write up a thorough summary. This allows the staff member to devote their full
587 attention to the child and to listen to what they are saying. It may be appropriate to make notes during
588 the report (especially if a second member of staff is present). However, if making notes, staff should be
589 conscious of the need to remain engaged with the child and not appear distracted by the note taking.
590 Either way, it is essential a written record is made using Concern form which is part of this policy. The
591 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report
592 to the DSL must be completed within an hour from the moment of the disclosure being made.

593 6.36. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of
594 the note taker. Staff should be aware that notes of such reports could become part of a statutory
595 assessment by Safeguarding Authority and/or part of a criminal investigation.

596 6.37. In cases where either a child/young person informs the staff that an act of FGM – however described –
597 has been carried out on her, or where the staff observes physical signs on a girl appearing to show that
598 an act of FGM has been carried out these situations, the police must be informed. The DSL should also be
599 informed who will trigger child protection/safeguarding procedures described in this policy. If a
600 child/young person is at immediate risk – the Police (999) must be contacted immediately. If a

601 child/young person required medical attention, follow steps identified in ‘**Setting priorities**’ section
602 below.

603 6.38. Remember, **do not**:

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

609 6.39. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**
610 **and recording procedure.**

611 6.40. All staff know that they can contact the Local Authority direct should that be necessary. Where a
612 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding
613 Adult Board. Where someone is over 18 but still receiving children’s services, the matter should be dealt
614 with by the local Safeguarding Adult Board.

615 6.41. For allegation made against a staff member or senior managers/directors follow relevant allegations
616 procedures described later on in this policy.

617 6.42. Where contact is made with the Local Authority in which Cambian Bletchley Park School is geographically
618 located, contact will also be made with the individual’s own Local Authority and also the child/young
619 person’s social worker. This will be completed by one of the members of the school safeguarding team.

620 6.43. In the case of serious harm, and/or the individual is in immediate danger the local police should be
621 informed immediately and they can take immediate protective action as necessary.

622 6.44. If a member of staff feels their concerns are not being taken seriously then they are to inform a more
623 senior manager, a Director of the Company or contact Ofsted, the local safeguarding boards, the police
624 or the **Whistleblowing Hotline – on 0800 086 9128.**

6 Risk Assessment

626 6.45. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk
627 and needs assessment. Where there has been a report of sexual harassment, the need for a risk
628 assessment should be considered on a case-by-case basis. The risk and needs assessment should
629 consider:

- 630 • the victim, especially their protection and support,
- 631 • whether there may have been other victims,
- 632 • the alleged perpetrator(s); and
- 633 • all the other children, (and, if appropriate, adult students and staff) at the school or college
634 especially, and any actions that are appropriate to protect them from the alleged
635 perpetrator(s), or from future harms.
- 636 • The time and location of the incident, and any action required to make the location safer.

637 6.46. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times,
638 staff should be actively considering the risks posed to all their pupils and students and put adequate
639 measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure they are
640 engaging with Safeguarding Authority and specialist services as required. Where there has been a report
641 of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence
642 specialists will be required. The above school or college risk assessment is not intended to replace the
643 detailed assessments of expert professionals. Any such professional assessments should be used to

644 inform the school's or college's approach to supporting and protecting their pupils and students and
645 updating their own risk assessment.

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

647 6.47. Important considerations will include:

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

671 6.48. As always when concerned about the welfare of a child, all staff should act in the best interests of the
672 child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout
673 this guidance. Immediate consideration should be given as to how best to support and protect the victim
674 and the alleged perpetrator(s) (and any other children involved/impacted).

675 **Options to manage the report**

676 6.49. It is important that schools and colleges consider every report on a case-by-case basis. When to inform
677 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going
678 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school or college
679 should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be
680 informed of the allegations. However, as per general safeguarding principles, this does not and should
681 not stop the school or college taking immediate action to safeguard their children, where required.

682 6.50. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual
683 violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are
684 regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly
685 important to look out for potential patterns of concerning, problematic or inappropriate behaviour.
686 Where a pattern is identified, the school or college should decide on a course of action. Consideration
687 should be given as to whether there are wider cultural issues within the school or college that enabled

the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

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

Unsubstantiated, unfounded, false or malicious reports

- 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation 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.
- 6.52. If a report is shown to be deliberately invented or malicious, the school or college should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Safeguarding and supporting the victim

- 6.53. The needs and wishes of the victim should be paramount (along with protecting the child)/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.
- 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

733 violence and sexual harassment, a power imbalance is likely to have been created between the victim
734 and alleged perpetrator(s).

735 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel
736 ashamed for making a report. This has been made clear throughout this policy and procedure.

737 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The
738 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different
739 from that for a report of rape.

740 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,
741 mental, and sexual health problems and unwanted pregnancy. Children and young people that have a
742 health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault
743 Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors
744 of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children
745 and adults, regardless of when the incident occurred.

746 6.58. Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and
747 practical support for victims of sexual violence. They are based within the specialist sexual violence sector
748 and will help the victim understand what their options are and how the criminal justice process works if
749 they have reported or are considering reporting to the police. ChISVAs will work in partnership with
750 schools and colleges to ensure the best possible outcomes for the victim.

7 Safeguarding and supporting the alleged perpetrator(s)

752 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice:
753 [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles
754 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding
755 and supporting the alleged perpetrator(s):

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

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

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

771 • It is important that the perpetrator(s) is/are also given the correct support to try to stop
772 them re-offending and to address any underlying trauma that may be causing this

behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

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

Setting priorities

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

6.61. Where appropriate, any concerns will be discussed with the individual's family / carers and where possible their agreement will be sought to making a referral to the Local Authority. However, where there is a conflict of interests between the Individual and parent/guardian, the interests of the individual must take priority and [Cambian Bletchley Park School the right to contact the individual's local authority, social care or the police, without notifying parents/carers if this is in their best interests.

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

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

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

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

Allegation of abuse by one or more Individuals on another Individual

6.66. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual is suffering or likely to suffer significant harm'. DSL must refer individual-on-individual abuse including child on child/young adult on young adult or between individuals of a different age or other to a Safeguarding Authority, local authority and regulator.

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 Service 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 school. However, the 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, an HR

820 Business Partner will have to be consulted first. At this point, an assessment will need to be made to
821 identify what detail (if any) can be disclosed to a member of staff involved.

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

823 6.68. If we were given information that suggested that someone who does not reside at or attends our location
824 has been abused by a third party (known or unknown to the provision), the DSL would immediately report
825 this to the Local Authority and Police. The Head of Service must be kept informed. DSL will follow advice
826 provided by the leading agency and report back to the Head of Service who will explore any associated
827 risk/s in relation to the provision.

828 **Allegations against staff**

829 6.69. All allegations must be reported to the DSL Stephen Doughty or in their absence to a DSL Deputy – see
830 your local Safeguarding poster. In addition, where appropriate - HR Business Partner must be consulted.

831 6.70. When an allegation is made against a member of staff, set procedures must be followed, see the flow
832 chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.

833 6.71. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully assessed
834 and investigated. Staff who are the subject of an allegation have the right to have their case dealt with
835 fairly, quickly and consistently and to be kept informed of its progress.

836 6.72. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided
837 for what to do in the event an allegation is made against them.

838 **Allegations against staff in Education**

839 6.73. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors.
840 The allegations are split into two groups:

- 841 • Allegations that may meet the harm threshold (see **LADO referral criteria**) – **meeting the**
842 **harm threshold** of this policy)
- 843 • Allegation/concerns that do not meet the harms threshold – referred in the guidance and
844 this policy as ‘low - level concerns’ - **Appendix 11. Low – level concerns (Education)**.

845 6.74. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they
846 continue to work in regular or close contact with children in their present position, or in any capacity with
847 children in a school or college.

848 6.75. The information above relate to members of staff, supply staff, volunteers and contractors who are
849 currently working in any school or college regardless of whether the school or college is where the alleged
850 abuse took place. It is advised that in Education allegations against people listed above should be referred
851 to the Head/Principal who is often the DSL, however where the Head/Principal is not the DSL, allegations
852 against staff including supply, volunteers and contractors must be referred to the Head/Principal who
853 may liaise with the DSL. This is because the concern/allegation may align with other performance or
854 personal related issues the Head/Principal might already be aware of, whereas the DSL may not be. The
855 Principal/Head should ensure the DSL is briefed as appropriate and will then decide whom the case should
856 be led by – the DSL or themselves. Allegations against a teacher who is no longer teaching should be
857 referred **to the police** and HR Business Partner advised.

858 6.76. Where an adult makes an allegation to a school or college that they were abused as a child, the individual
859 should be advised to report the allegation to the police. Non-recent allegations made by a child, should
860 be reported to the LADO in line with the local authority’s procedures for dealing with non-recent
861 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no
862 matter how long ago it happened.

863 6.77. Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher
864 because of serious misconduct, or might have dismissed them or ceased to use their services had they
865 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching

866 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found
867 on GOV.UK.
868

8 Allegations against supply teachers and all workers supplied by agency

870 6.78. In some circumstances schools and colleges will have to consider an allegation against an individual not
871 directly employed by them, where its disciplinary procedures do not fully apply because agencies will
872 have their own policies and procedures; for example, supply teachers or contracted staff provided by an
873 employment agency or business.

874 6.79. Whilst the organisation's schools and colleges are not the employer of supply teachers, they should
875 ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease
876 to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the
877 LADO to determine a suitable outcome. Schools and colleges must also consult the HR Business Partner
878 who may advise further. Governance boards and proprietors should discuss with the supply agency or
879 agencies where the supply teacher is working across a number of schools or colleges, whether it is
880 appropriate to suspend the supply teacher, or redeploy them to another part of the school or college,
881 whilst they carry out their investigation.

882 6.80. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or
883 children's social care. The school or college will usually take the lead because agencies do not have direct
884 access to children or other school or college staff, so they will not be able to collect the facts when an
885 allegation is made, nor do they have all the relevant information required by the LADO as part of the
886 referral process.

887 6.81. When using a supply agency, schools and colleges should inform the agency of its process for managing
888 allegations but also take account of the agency's policies and investigatory process and their duty to refer
889 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or
890 equivalent to meetings and keeping them up to date with information about its policies. It is important
891 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be
892 consulted.
893

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

895 6.82. All allegations must be reported to:

896 - Education division: Regional Education Lead Jarlath O'Brien. For the DSL fulfilling the role
897 as their substantive role, all allegations must be reported to the Headteacher.

898 6.83. Depending on the division and who is the service DSL, people notified of allegation made (see above) will
899 then refer the matter to LADO and notify their line manager:

900 - Education division: Regional Education Lead Jarlath O'Brien or

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

903 6.84. The person who referred the matter to local LADO in line with agreed course of action will decide about
904 who will lead the case including management investigation – should the allegation threshold be met. The
905 appropriate HR Business Partner should be notified, so they can advise and where required - support the
906 investigation.

9 Allegations against the Regional Manager/other Regional staff

908 6.85. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Headteacher)
909 who will make the initial referral to LADO. Following this, the allegation should be passed to the identified
910 senior person to follow through with LADO and subsequently act in line with agreed course of action. This
911 means that the DSL will retain the responsibility to report the initial concern, but will have no further part

912 in the process regarding gathering any information or, should it be required, in the actual investigation
913 in relation to a senior member.

914 6.86. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to
915 LADO and act in line with agreed course of action.

916 6.87. The appropriate HR Business Partner should be notified, so they can advise and where required - support
917 the investigation.

918 Allegations against the Operations Directors or Managing Director

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

925 6.89. Allegations not linked to specific site must be reported to Managing Director for Education who will refer
926 the matter to LADO and act in line with agreed course of action.

927 6.90. The Head of HR should be notified, so they can advise and where required - support the investigation.

928 Allegations against any other Senior Leader

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

935 6.92. Allegations not linked to specific site must be reported to the person's (whom allegation is made against)
936 line manager who will refer the matter to LADO and act in line with agreed course of action.

937 6.93. The Head of HR should be notified, so they can advise and where required - support the investigation.

938 Allegations against the Executive Head of Children's Services

939 6.94. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
940 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
941 to the identified senior person to follow through with LADO and subsequently act in line with agreed
942 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
943 will have no further part in the process regarding gathering any information or, should it be required, in
944 the actual investigation in relation to a senior member.

945 6.95. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
946 Amanda Sherlock who will refer the matter to LADO and act in line with agreed course of action.

947 6.96. The Head of HR should be notified, so they can advise and where required - support the investigation.

948 Allegations against the Chief Executive Officer

949 6.97. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
950 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
951 to the identified senior person to follow through with LADO and subsequently act in line with agreed
952 course of action. This means that the DSL will retain the responsibility to report the initial concern, but

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

955 6.98. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
956 Amanda Sherlock who will refer the matter to LADO and act in line with agreed course of action.

957 6.99. The Head of HR should be notified, so they can advise and where required - support the investigation.

958 Allegations - The initial response

959 6.100. Where the school or college identifies a child/young person has been harmed, that there may be an
960 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact
961 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are
962 two aspects to consider when an allegation is made:

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

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

969 6.101. When dealing with allegations, schools and colleges should:

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

973 6.102. Schools and colleges should ensure they understand the local authority arrangements for managing
974 allegations, including the contact details and what information the LADO will require when an allegation
975 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with
976 local procedures to establish the facts to help them determine whether there is any foundation to the
977 allegation, being careful not to jeopardise any future police investigation. For example:

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

982 6.103. These are just a sample of example questions. Services should be familiar with what initial information
983 the LADO will require. This information can be found in local policy and procedural guidance provided by
984 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared
985 with the HR department to support any investigation.

986 6.104. When to inform the individual of the allegation should be considered carefully on a case-by-case basis,
987 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

988 6.105. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion
989 involving the police and/or children's social care will be convened in accordance with the statutory
990 guidance [Working Together to Safeguard Children](#).

991 6.106. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the
992 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps
993 with the case manager (A 'case manager' will be the person leading any investigation. In most cases this
994 will be a senior leader from outside the school/home). The LADO should be informed who will lead the

995 investigation to ensure there is no conflict of interest or any other concerns related to the choice of the
996 case manager.

997 **No Further Action**

998 6.107. Where the initial discussion initial discussion leads to no further action, the case manager and the LADO
999 should:

- 1000 • record the decision and justification for it; and,
- 1001 • agree on what information should be put in writing to the individual concerned and by
1002 whom.

1003 **Further enquiries**

1004 6.108. Where further enquiries are required to enable a decision about how to proceed, the LADO and case
1005 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases,
1006 the investigation should normally be undertaken by a senior member of the school's or college's staff.

1007 6.109. Where there is a lack of appropriate resource within the school or college, or the nature or complexity
1008 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional
1009 Lead (Education or Care), a Director, HR Business Partner or an independent investigator if appropriate.

1010 6.110. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as
1011 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals,
1012 depending on the complexity of the case.

1013 6.111. Wherever possible, the first review should take place no later than four weeks after the initial
1014 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review
1015 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges
1016 when considering allegations against adults working with children. The LADO's role is not to investigate
1017 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police,
1018 children's social care, the school or college, or a combination of these.

1019 **Suspension**

1020 6.112. Suspension should not be an automatic response when an allegation is reported. All options to avoid
1021 suspension should be considered prior to taking that step. The case manager must consider carefully
1022 whether the circumstances warrant suspension from contact with children at the school or college, or
1023 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a
1024 child or other children at the school or college is/are at risk of harm, or the allegation could be considered
1025 as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR
1026 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have been
1027 involved. More information on suspension and associated process can be found in [KCSIE 2023 Part 4 -
1028 Suspension](#).

1029 **Supporting those involved**

1030 6.113. The welfare of a child/young person is paramount) and this will be the prime concern in terms of
1031 investigating an allegation against a person in a position of trust. However, when an allegation or
1032 safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject
1033 of the investigation, and potentially for the family members. It is important that an employer offers
1034 appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is
1035 confidential and should not ordinarily be shared with the other staff or with children or parents who are

1036 not directly involved in the investigation. More about employer's duty of care to their employees can be
1037 found in the KCSIE2023 guidance.

1038 6.114. Staff whom allegation/s have been made against must always be supported and if suspended they will
1039 receive a support person (nominated contact), any suspension is not an indication of guilt.

1040 Allegation outcomes

1041 6.115. The definitions that should be used when schools and colleges determine the outcome of an allegation
1042 are set out below:

- 1043 • Substantiated: there is sufficient evidence to prove the allegation;
- 1044 • Malicious: there is sufficient evidence to disprove the allegation and there has been a
1045 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1046 • False: there is sufficient evidence to disprove the allegation;
- 1047 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.
1048 The term, therefore, does not imply guilt or innocence; or
- 1049 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the
1050 allegation being made.

1051 6.116. It should be noted that these definitions are available to support the decision-making process. However,
1052 in certain cases, in the absence of any substantiating evidence, the Company may still progress through

1053 the formal disciplinary procedure if there are reasonable grounds to do so, or there is a reasonable belief
1054 that an employee has committed an act of misconduct.

1055 6.117. Ultimately, the options open to the school or college depend on the nature and circumstances of the
1056 allegations and the evidence and information available. This will range from taking no further action, to
1057 dismissal or a decision not to use the person's services in future.

1058 **Serious incident reporting**

1059 6.118. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported
1060 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

1061 **Death of someone in our care including rapid response to unexpected death**

1062 6.119. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
1063 rapid response, process described below:

- 1064 • Call the Ambulance and Police
- 1065 • Unless the 999 operator tells you to, do not touch the person; do not move anything
- 1066 around them, which may form part of forensic evidence. Police will decide about the
- 1067 forensic examinations and appropriate security of the scene.
- 1068 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI)
- 1069 reporting procedure. The DSL will contact the Managing Director of the division they work
- 1070 in and verbally inform them of what happened before completing SUI Part 2.
- 1071 • DSL will contact Children's/Adults Social Care Team
- 1072 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health
- 1073 Services (CAMHS) should also be notified by the Safeguarding Authority.

1074 6.120. Once the above rapid steps have been taken, further steps described below must be followed.

1075 6.121. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the
1076 following within 24 hours:

- 1077 • Group Executive Director Managing Director, Responsible/Nominated Individual, Regional
- 1078 Lead following the **35.01. Caretech Children's services SUI process.**
- 1079 • Next of kin/parents/carers of the deceased.
- 1080 • Where the death of an individual occurs in an education location the assistance of the
- 1081 local police and social services department should be sought in informing the
- 1082 parents/guardians.
- 1083 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn
- 1084 • Ministry of Justice if applicable.
- 1085 • The placing authority/authorities.
- 1086 • The local authority responsible for Social Services and Education (where the death takes
- 1087 place in a registered school) within whose area the education location is situated.
- 1088 • The District Health Authority within whose area the education location is situated.
- 1089 • The Department for Education, (where the death takes place in a registered school).
- 1090 • The Health and Safety Executive.

1091 **Abuse of position of trust**

1092 6.122. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,
1093 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the
1094 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a
1095 position of trust, even if the relationship is consensual. This means that any sexual activity between a

1096 member of the staff and a young person under 18 may be a criminal offence, even if that young person
1097 is over the age of consent.

1098 **Visitors**

1099 6.123. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.
1100 All unauthorised visitors will be challenged by staff and reported to the home
1101 manager/headteacher/principal before entry is authorised.

1102 **Volunteers**

1103 6.124. Volunteers undergo checks commensurate with their work in the home/school/college and contact with
1104 children, young people and adults i.e. if they are in regulated activity or not.

1105 **Contractors**

1106 6.125. We will check the identity of all contractors working on site and request the full range of DBS and other
1107 required checks where they work in regulated activity or unsupervised in accordance with the latest
1108 government guidance.

1109 **Use of school or college premises for non-school/college activities**

1110 6.126. Where governance boards or proprietor hire or rent out school or college facilities/premises to
1111 organisations or individuals (for example to community groups, sports associations, and service providers
1112 to run community or extra-curricular activities) they should ensure that appropriate arrangements are in
1113 place to keep children safe.

1114 **Extended school and off-site arrangements**

1115 6.127. Where extended off-site activities are provided by and managed by us, our safeguarding policy and
1116 procedures apply. If other organisations provide services or activities on our site we will check that they
1117 have appropriate policies and procedures in place, including safer recruitment procedures and clarify
1118 whose procedure is to be followed if there are concerns. There will be clear communication channels to
1119 ensure the DSL is kept appropriately informed.

1120 6.128. When our Individuals are doing off-site activities, including day and residential visits and work-related
1121 activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL
1122 will be kept appropriately informed.

1123 **Use of mobile phones**

1124 6.129. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media
1125 access including **Pro 01. Mobile Telephony Policy** at all times.

1126 6.130. All computer equipment and internet access within the home/school/college is subject to 'parental
1127 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social
1128 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons
1129 during working hours. Staff need to help our Individuals to prepare for the dangers of the internet and

1130 social media whilst promoting the many learning and social opportunities available through the internet
1131 and social media.

1132 6.131. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST
1133 neither mention Bletchley Park School or refer to their employment at the school. Staff are advised not
1134 to communicate with parents, guardians, carers or Individuals via social networking sites

1135 **Photography and images**

1136 6.132. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1137 6.133. The vast majority of people who take or view photographs or videos of individuals do so for entirely
1138 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through
1139 taking or using images, so we have some safeguards in place.

1140 6.134. To protect our children, young people or young adults we will:

- 1141 • seek their consent for photographs to be taken or published (for example, on our website
1142 or in newspapers or publications)
- 1143 • seek parental consent of consent from the Individual
- 1144 • not use their full name with an image, only their initials
- 1145 • ensure that personal data is not shared
- 1146 • store images appropriately, securely and for no longer than necessary
- 1147 • only use school equipment, i.e. not personal devices
- 1148 • encourage our children, young people and adults to tell us if they are worried about any
1149 photographs that are taken of them

1150 **Physical intervention and use of reasonable force**

1151 6.135. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are
1152 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**
1153 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,
1154 recorded and monitored.

1155 **Staff taking medication or other substances**

1156 6.136. Staff members must not be under the influence of alcohol or any other substance, which may affect their
1157 ability to care for the individuals. If they are taking medication, they should seek medical advice and
1158 inform the Home Manager/Headteacher/Principal who will review the medical advice and take a decision
1159 as to whether they are fit for work.

1160 6.137. We only allow staff to work if medical advice confirms that their ability to look after individuals is unlikely
1161 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it
1162 must be securely stored and out of reach of all children, young people and young adults. This section
1163 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

1164 **Information for individuals and relatives/carers**

1165 6.138. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt
1166 with independently and that they will be kept involved in the process to the degree that they wish to be.
1167 They will be reassured that they will receive help and support in taking action.

1168 6.139. They will also be advised that they can nominate an advocate or representative to speak and act on their
1169 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could
1170 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be
1171 appointed. They will be advised of rights to legal aid in where appropriate to victim support and
1172 compensation.

1173 **Recruitment and vetting**

1174 6.140. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**
1175 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1176 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting
1177 schools should read Part 3 of KCSIE2023 guidance dedicated to Safer Recruitment.

1178 6.141. Each education location maintains a **Single Central Record (SCR)**. This covers all staff including supply
1179 teaching and teacher trainees, agency care staff as well as multisite managers and members of the
1180 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1181 6.142. For agency workers we obtain written confirmation that all checks have been completed, in line with
1182 safer recruitment from the employment business that is supplying the member of agency staff. All
1183 Locations must ensure that an agreement exists between the Location and the agency to confirm that, in
1184 the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate
1185 before that person can begin work at the home/school/college.

1186 6.143. All locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the
1187 agency.

1188 6.144. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the
1189 same recruitment regulations and procedures as the education staff.

1190 Requirements to inform Disclosure and Barring Services (DBS)

1191 6.145. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the
1192 barred lists is required.

1193 6.146. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one
1194 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to
1195 safeguarding concerns, or would have been had they not resigned.

1196 6.147. In the case of a member of teaching staff at a school or sixth form college, the case manager must
1197 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

1198 6.148. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,
1199 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she
1200 is considered unsuitable to work with children and young people.

1201 6.149. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is
1202 provided at paragraph 179.

1203 6.150. All managers must read the group leavers policy – all referrals must be recorded with HR so they can
1204 ensure any future references are correct. The references team log referrals so this can be completed. This
1205 will apply to both: DBS and TRA.

1206 Record keeping

1207 6.151. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is
1208 made, staff must keep clear and accurate records using a Concern Form.

1209 6.152. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in
1210 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns
1211 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch
1212 have Concern/Safeguarding function to record any concerns being raised. A report per child/young
1213 person can also be generated.

1214 6.153. Records should be factual, accurate, concise, ethical and relevant.

1215 6.154. All recording of written information should be legible and discussions with other professionals and
1216 agencies should be recorded chronologically.

1217 6.155. There will be a safeguarding section/folder for each Individual, which will hold any concerns/safeguarding
1218 documentation for that individual. At the front of each folder, there is an Index for Individual's Concerns.
1219 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1220 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure
1221 location.

1222 6.156. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**
1223 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information
1224 where the concern has escalated. Where this is held as a paper version this is to be made into a bound
1225 booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies
1226 only. In either case, this should be kept in a secure location.

1227 **Monitoring**

1228 6.157. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded,
1229 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section**
1230 **9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators
1231 (KPIs) using **CambianKPI** and the identification and management of safeguarding risks. A report on the
1232 position of every site in relation to their KPIs is produced every Wednesday.

1233 **Training**

1234 6.158. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction
1235 introduces the new staff member to the policy, procedure and practice at the location. They will also be
1236 orientated as to where to find information regarding safeguarding including relevant posters around the
1237 location. As part of their induction all staff are required to read this policy and confirm that, they
1238 understand their role in safeguarding and protecting young people within the service they are going to
1239 work.

1240 6.159. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must
1241 be completed as part of staff member induction and annually thereafter. This should include online
1242 safety. This is to maintain staff awareness of their responsibilities in relation to children /young
1243 people/young adult's safeguarding.

1244 6.160. Staff will not be allowed to work with individuals unless they have completed the above training. The
1245 school/college/home must check that supply/agency staff have completed basic awareness training
1246 before being allowed into contact with Individuals.

1247 6.161. Contractors and others on site who might have unsupervised access to individuals must also complete
1248 basic awareness training before being allowed to start work.

1249 6.162. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and
1250 practice throughout the year. This can be undertaken in various forums: as a face-to-face or online
1251 session, staff meetings or workshops. In addition to this, safeguarding updates including various
1252 resources are provided to schools and colleges by the external Safeguarding Network.

1253 6.163. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge
1254 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA
1255 within the boundaries they operate and be refreshed at least every two years. Both should also undertake
1256 Prevent awareness training.

1257 **Confidentiality and information sharing**

1258 6.164. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting
1259 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear
1260 powers to share, hold and use information for these purposes. Staff should be proactive in sharing
1261 information as early as possible to help identify, assess and respond to risks or concerns about the safety
1262 and welfare of children/ young people whether this is when problems are first emerging, or where a child
1263 is already known to local authority children's social care.

1264 6.165. Where the police are involved, wherever possible the school or college should ask the police to obtain
1265 consent from the individuals involved to share their statements and evidence for use in the employer's

- 1266 disciplinary process. This should be done as their investigation proceeds and will enable the police to
1267 share relevant information without delaying the conclusion of their investigation or any court case.
- 1268 6.166. The Safeguarding authority should adopt a similar procedure when making enquiries to determine
1269 whether the child or children named in the allegation need protection or services, so that any information
1270 obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the
1271 employer without delay.
- 1272 6.167. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the
1273 following:
- 1274 • who needs to know and exactly what information can be shared;
 - 1275 • how to manage speculation, leaks and gossip
 - 1276 • what, if any, information can be reasonably given to the wider community to reduce speculation;
1277 and
 - 1278 • how to manage press interest if, and when, it should arise.
- 1279 6.168. Exchange or disclose of personal information with other agencies will be completed in accordance with
1280 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation including
1281 the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process
1282 personal information fairly and lawfully and to keep the information they hold safe and secure.
- 1283 6.169. Information relating to individual Safeguarding cases is confidential, although some information can be
1284 shared with relevant staff. This should be done only on a 'need to know' basis.
- 1285 6.170. Governance Boards and proprietor should ensure relevant staff have due regard to the relevant data
1286 protection principles, which allow them to share (and withhold) personal information, as provided for in
1287 the Data Protection Act 2018 and the GDPR. This includes:
- 1288 • being confident of the processing conditions which allow them to store and share
1289 information for safeguarding purposes, including information which is sensitive and
1290 personal, and should be treated as 'special category personal data'.
 - 1291 • understanding that 'safeguarding of children and individuals at risk' is a processing
1292 condition that allows practitioners to share special category personal data. This includes
1293 allowing practitioners to share information without consent where there is good reason
1294 to do so, and that the sharing of information will enhance the safeguarding of a child in
1295 a timely manner but it is not possible to gain consent, it cannot be reasonably expected
1296 that a practitioner gains consent, or if to gain consent would place a child at risk.
 - 1297 • for schools, not providing pupils' personal data where the serious harm test under the
1298 legislation is met. For example, in a situation where a child is in a refuge or another form
1299 of emergency accommodation, and the serious harms test is met, they must withhold

- 1300 providing the data in compliance with schools' obligations under the Data Protection Act
1301 2018 and the GDPR. Where in doubt schools should seek independent legal advice.
- 1302 6.171. When sharing safeguarding information regarding an individual, staff will need to consider the following:
- 1303 • Information should only be shared on a 'need to know' basis when it is in the best interests
1304 of the individual
 - 1305 • Informed consent should be obtained but, if this is not possible and other adults are at risk
1306 of abuse or neglect, it may be necessary to override the requirement
 - 1307 • Distinguish fact from opinion
 - 1308 • Ensure you are giving the right information about the right person
 - 1309 • Ensure you are sharing information securely
 - 1310 • Inform the person that the information has been shared if they were not already aware of
1311 this and if it would not create or increase risk of harm to them/others.
- 1312 6.172. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of
1313 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the
1314 need to safeguard and promote the welfare and protect the safety of children.
- 1315 6.173. Further details on information sharing can be found in:
- 1316 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting
1317 guide to information sharing
 - 1318 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children,
1319 Young People, Parents and Carers](#). The seven golden rules for sharing information will
1320 be especially useful
 - 1321 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and
1322 guidance from the department
 - 1323 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection
1324 activity, including compliance with the GDPR.
- 1325 6.174. The following wording is to be added to any covering letter where we are sharing documentation:
1326 "The material contained in this letter and its enclosures are confidential to Cambian Group and the
1327 persons named within the documentation. The documentation is delivered only in accordance with a
1328 perceived legal obligation to make the documentation available and upon the strict understanding that
1329 the recipient and all members of the recipient's staff will undertake to preserve confidentiality and not
1330 in any way share the documentation or any details of the information therein contained with any other
1331 party. Any person receiving this information who breaches these obligations of confidentiality will be

1332 held strictly responsible and will be expected to indemnify Cambian Group and any persons named within
1333 the documentation against any losses that may arise as a result of misuse of this material”.

1334 6.175. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for
1335 the Caldicott Guardian at our location is Dr Vishelle Kamath, Group Medical Director for Caretech.

1336 6.176. Failure to follow this policy and local procedure may result in disciplinary action.

1337 **Complaints and Monitoring**

1338 6.177. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**
1339 **procedure**, with reference to the our Designated Safeguarding Officer who is Stephen Doughty (DSL) and
1340 Milton Keynes Safeguarding Children’s Board

1341 **7. Accountability**

1342 7.1. Stephen Doughty is the DSL at Cambian Bletchley Park School and has lead responsibility for protecting
1343 and safeguarding children, young people and young adults and liaising with the local authority and other
1344 local agencies as appropriate. This includes young person protections, referrals, raising awareness,
1345 training, allocating resources and supporting/directing staff within the Location. In all matters, relating
1346 to young person protection and safeguarding Cambian Bletchley Park School will follow the procedures
1347 outlined in this policy.

1348 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by
1349 the Head of Service. Our Managing Director, Andrew Sutherland will undertake a full annual review of
1350 the content and effective application of this policy and associated procedures. The date for the next
1351 scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes in
1352 legislation, regulatory requirements or as a result of best practice guidance.

1353 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director
1354 Compliance, who will support and promote the development of initiatives to improve the prevention,
1355 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is
1356 also responsible for reporting on safeguarding and providing executive leadership.

1357 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1358 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can
1359 be stressful and distressing for staff.

1360 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,
1361 allied health professionals and nurses) should understand how their professional standards and
1362 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

1363 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1364 need to share a common view of what types of behaviour may be abuse or neglect and what should be
1365 an initial response to suspicion or allegation of abuse or neglect.

1366 7.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency
1367 safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies
1368 which define the local practice that must be followed.

1369 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable
1370 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact
1371 names and details if required.

1372 **8. Further Safeguarding information – what everyone needs to know** 1373 **(Appendix 12)**

1374 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours
1375 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual
1376 and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children

1377 are at risk. Other safeguarding issues such as child on child/young adult on young adult abuse staff should
1378 be aware of are explored in the **Appendix 12. Further Safeguarding information – what everyone needs**
1379 **to know.**

1380 **9. Appendices**

1381 **Appendix 1: Relevant policies and documents**

- 1382 **1.** Child Protection and Safeguarding
 - 1383 a) 25.01 - Index Form for Individuals Concern File
 - 1384 b) 25.02 - Abuse Poster Individual
 - 1385 c) 25.03 - Individual Safeguarding booklet – Easy Read
 - 1386 d) 25.04 - Concern Form
 - 1387 e) 25.05 - Safeguarding Tracking Pack
 - 1388 f) 25.06 – Visitor Information Leaflet template
 - 1389 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
 - 1390 h) 25.08 – Guidance to staff who had an allegation made against them
 - 1391 i) 25.09 – Local Safeguarding procedure
 - 1392 j) 25.10 – Staff Safeguarding Information poster
 - 1393 k) 25.11 – Guidance notes for Designated or On-call person
 - 1394 l) 25.12 – Static body chart
 - 1395 m) 25.13 – Weekly body chart
 - 1396 n) 25.14 – Guidance for Investigating Unexplained Body Marks
 - 1397 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
- 1398 **2.** Whistleblowing
- 1399 **3.** Anti-bullying
- 1400 **4.** Child Sexual Exploitation
- 1401 **5.** Intimate and Invasive Care
- 1402 **6.** Self-harm and suicide
- 1403 **7.** Behaviour Support
- 1404 **8.** Physical Intervention
- 1405 **9.** Complaints Policy
- 1406 **10.** Health
- 1407 **11.** E –safety
- 1408 **12.** Capacity to consent
- 1409 **13.** Prevent

1410	14.	Recruitment
1411	15.	Code of Conduct
1412	16.	Data Protection
1413	17.	Confidentiality
1414	18.	Disciplinary
1415	19.	Code of Practice
1416	20.	Mobile telephony
1417	21.	SUI Caretech children's services process
1418	22.	Caretech - Group Leaving Policy
1419	23.	GHR 02 – Harassment and Bullying
1420	24.	GHR 41 – Reference Requests
1421	25.	GHR 41.1 DBS referral log
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Appendix 2: Legislation and guidance

1427	•	The Children Act 2004, as amended by the Children and Social Work Act 2017
1428	•	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
1429		
1430	•	Guide to the Young people's/care home Homes Regulations including the Quality Standards (DfE: April 2015)
1431		
1432	•	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)
1433		
1434		
1435	•	The Health and Social Care Act 2008 (Regulated Activities) Regulations 2015
1436	•	Female Genital Mutilation Act 2003, (as inserted by section 74 of the Serious Crime Act 2015)
1437	•	Terrorism Act 2000
1438	•	Counter Terrorism and Security Act 2015
1439	•	The School staffing regulations , England 2009
1440	•	The Teachers Disciplinary regulations, 2012
1441	•	Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.
1442	•	All Wales Child Protection Procedures 2008
1443	•	All Wales POVA Guidance 2008
1444	•	Keeping learners safe GOV.WALES
1445	•	The Care Act 2014
1446	•	Social services and wellbeing Act 2014
1447	•	Working Together to Safeguard Children 2018
1448		Keeping Children Safe in Education 2023
1449	•	Keeping Children Safe in Education 2023 Part 1
1450	•	Regulated activity in relation to children: scope
1451	•	What to do if you're worried a child is being abused

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

1494 DSL– DSL

CSC– Children’s Social Care

1495 CAF – Common Assessment framework

LADO – Local Authority Designated Officer

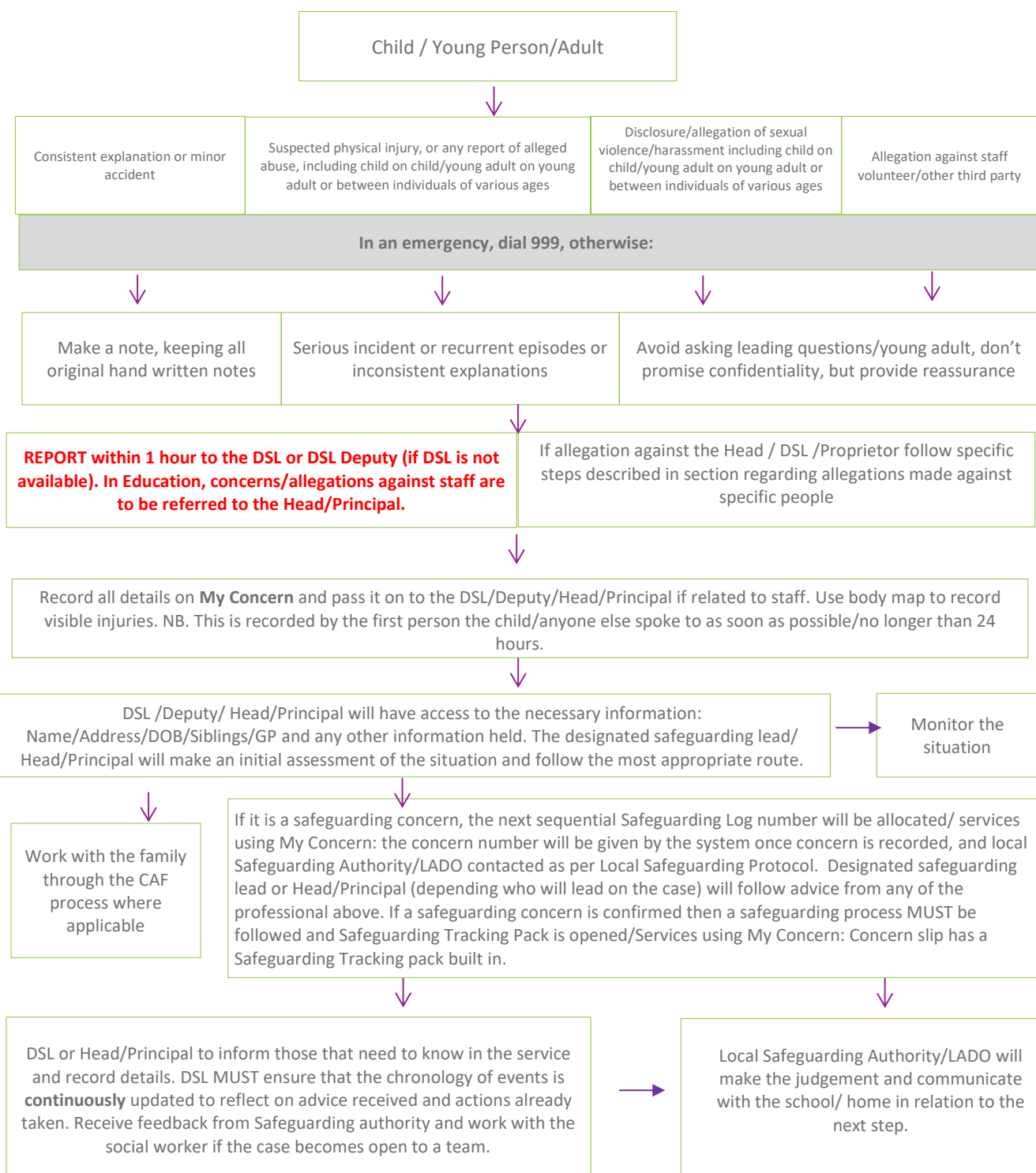
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1546 **Appendix 4: Types of abuse – children**

- 1547 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or
1548 by failing to act to prevent harm. Children may be abused in a family or in an institutional or community
1549 setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or
1550 technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by
1551 another child or children
- 1552 • **Physical abuse:** a form of abuse, which may involve hitting, slapping, shaking, throwing, poisoning,
1553 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm
1554 may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in
1555 a child.
- 1556 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse
1557 effects on the child's emotional development. It may involve conveying to a child that they are worthless
1558 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include
1559 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of
1560 what they say or how they communicate. It may feature age or developmentally inappropriate
1561 expectations being imposed on children. These may include interactions that are beyond a child's
1562 developmental capability as well as overprotection and limitation of exploration and learning, or
1563 preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-
1564 treatment of another. It may involve serious bullying (including cyberbullying), causing children
1565 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of
1566 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1567 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example
1568 rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of
1569 clothing. They may also include non-contact activities, such as involving children in the production of
1570 sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children
1571 to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the
1572 internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual
1573 abuse, as can other children. The sexual abuse of children by other children or young adults by other
1574 young adults or between individuals of different age is a specific safeguarding issue in education and all
1575 staff should be aware of it and of their school or colleges policy and procedures for dealing with it.
- 1576 • **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an
1577 individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child
1578 into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or
1579 for the financial advantage or increased status of the perpetrator or facilitator and/or through violence
1580 or the threat of violence. CSE and CCE can affect children, both male and female and can include children
1581 who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual
1582 Exploitation does not always involve physical contact; it can also occur through the use of technology.
- 1583 • **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result
1584 in the serious impairment of the child's health or development. Neglect may occur during pregnancy as
1585 a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
1586 provide adequate food, clothing and shelter (including exclusion from home or abandonment);
1587 protect a child from physical and emotional harm or danger; ensure adequate supervision (including the
1588 use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also
1589 include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 1590 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through
1591 social media, online games or other channels of digital communication. Children can also be re-victimised
1592 if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal
1593 abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child
1594 sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual
1595 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using
1596 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that
1597 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as
1598 inappropriate behaviours or content online. For instance, children may be bullied online by other

1599 children/young people/young adults they know/others who they don't know or they might, either
1600 accidentally or intentionally, view content, which is intended for adults. Both online abuse and exposure
1601 to unsuitable content or behaviour can have a long-lasting impact on the wellbeing of children and young
1602 people.

1603 **Appendix 5: Types of abuse - adults**

- 1604 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling,
1605 scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone
1606 purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding
1607 or withholding food, unauthorized restraint, restricting movement.
- 1608 • **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the
1609 honour of the family and/or the community including female genital mutilation (FGM), forced marriage
1610 and practices such as breast ironing. Abuse committed in the context of preserving "honour" often
1611 involves a wider network of family or community pressure and can include multiple perpetrators. It is
1612 important to be aware of this dynamic and additional risk factors when deciding what form of
1613 safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be
1614 handled and escalated as such. Professionals in all agencies, individuals and groups in relevant
1615 communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered
1616 HBA.
- 1617 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse
1618 outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence
1619 and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour,
1620 violence or abuse between those aged 16 or over who are or have been, intimate partners or family
1621 members regardless of gender or sexuality.
- 1622 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual
1623 masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of
1624 the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to,
1625 inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced
1626 use of pornography or witnessing of sexual acts, Indecent exposure.
- 1627 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing
1628 services, educational and social opportunities and seeing friends, removing mobility or communication
1629 aids or intentionally leaving someone unattended when they need assistance, preventing someone from
1630 meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to
1631 respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion,
1632 harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a
1633 patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- 1634 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from
1635 accessing their own money, benefits or assets, employees taking a loan from a person using the service,
1636 undue pressure, duress, threat or undue influence put on the person in connection with loans, wills,
1637 property, inheritance or financial transactions, arranging less care than is needed to save money to
1638 maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to
1639 access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in
1640 a family home, someone moving into a person's home and living rent free without agreement or under
1641 duress, false representation, using another person's bank account, cards or documents, exploitation of a
1642 person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy,
1643 appointee ship or other legal authority.
- 1644 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as
1645 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that
1646 realistically they never will be able to.
- 1647 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and
1648 civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as
1649 'protected characteristics' under the Equality Act 2010). Verbal abuse, derogatory remarks or
1650 inappropriate use of language related to a protected characteristic, denying access to communication
1651 aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on
1652 the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and

- 1653 criminal justice relating to a protected characteristic, substandard service provision relating to a
1654 protected characteristic.
- 1655 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-
1656 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and
1657 supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful
1658 attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and
1659 privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or
1660 assistance with eating, not offering choice or promoting independence, misuse of medication, failure to
1661 provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious
1662 or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence
1663 or communication, failure to respond to complaints.
 - 1664 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,
1665 stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure
1666 to administer medication as prescribed, refusal of access to visitors, not taking account of individuals'
1667 cultural, religious or ethnic needs, not taking account of educational, social and recreational needs,
1668 ignoring or isolating the person, preventing the person from making their own decisions, preventing
1669 access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
 - 1670 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of
1671 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,
1672 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise
1673 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more
1674 appropriate under the parts of the Care Act dealing with assessment, planning, information and advice,
1675 and prevention.
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Appendix 6: Signs that someone could be a victim

Physical abuse

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

Sexual abuse

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

Psychological or emotional abuse

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

Neglect and acts of omission

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

1725 Unsuitable clothing or not enough clothes

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1727 **Domestic abuse**

- 1728 • becoming anxious or depressed
- 1729 • having difficulty sleeping
- 1730 • complaining of physical symptoms such as tummy aches
- 1731 • starting to wet their bed
- 1732 • behaving as though they are much younger than they are
- 1733 • having problems with school
- 1734 • becoming aggressive or they may internalise their distress and withdraw from other people
- 1735 • having a lowered sense of self-worth
- 1736 • older children may begin to play truant or start to use alcohol or drugs
- 1737 • they beginning to self-harm by taking overdoses or cutting themselves

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1739 **Child on Child/Young adult on young adult abuse/between individuals of different age**

- 1740 • absence from school or disengagement from school activities
- 1741 • physical injuries
- 1742 • mental or emotional health issues
- 1743 • becoming withdrawn – lack of self esteem
- 1744 • lack of sleep
- 1745 • alcohol or substance misuse
- 1746 • changes in behavior
- 1747 • inappropriate behavior doe age
- 1748 • 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.

1823 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**
1824 **and recording procedure**

- 1825 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within 1
1826 hour from the moment of disclosure/report from the child/young person/other person completes and
1827 passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of
1828 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern is
1829 related to the staff and the Head/Principal is not available, staff must report their concern to the DSL
1830 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal
1831 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally before
1832 completing the Concern/Safeguarding slip in the system.
- 1833 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details
1834 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on
1835 the Concern Form. Services using My Concern – DSL/DSL Deputy or Head/Principal reviews the concern
1836 and decides on the next step which may lead to Safeguarding Tracking Pack being opened (Safeguarding
1837 Tracking Pack is built as part of the concern slip should the case proceed to safeguarding).
- 1838 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy or
1839 Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on
1840 the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and
1841 immediately (or at least within one hour of receiving the concern form, make a referral to the local
1842 Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to discuss the
1843 allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the My Concern system
1844 will progress to the next stage – Safeguarding part of the concern/SG slip which is only accessible to the
1845 Safeguarding Team.
- 1846 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a
1847 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on the
1848 Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal
1849 Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy MUST ensure that a member of their
1850 Senior Management Team is assigned to look into the concern. The review must be recorded and
1851 outcomes shared with the people involved. Feedback from the review session MUST be provided to local
1852 Safeguarding Authority/LADO. Services using the My Concern system will follow the same set of steps
1853 apart from populating the Central Log of Concerns and Safeguarding as the log can be generated by the
1854 system using chosen filtering criteria.
- 1855 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken.
1856 This diligent approach will ensure a clear historic record of contact with local Safeguarding
1857 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with
1858 the local Safeguarding Authority/LADO whichever appropriate.
- 1859 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that it
1860 requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must
1861 be opened with the next sequential Safeguarding Reference included on the form and details as such
1862 entered on the central log.
- 1863 • Services using the My Concern system – where a concern progresses to Safeguarding Tracking Pack being
1864 opened, a one record will be created including the original concern, with the whole document having the
1865 same slip number.
- 1866 • Services which don't use My Concern or where the concern/allegation is about the Head/Principal or the
1867 DSL who have access to BW: Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-
1868 5) should be submitted to the **Responsible/Nominated Individual and** in day schools - **Regional**
1869 **Education Manager** as a follow up to the initial reporting telephone contact. STP must be sent again to
1870 **Responsible/Nominated Individual and Regional Education Manager** on completion, providing detailed
1871 overview of the actions taken and the final outcome.. The **Responsible/Nominated Individual and**

- 1872 **Regional Education Manager** in day schools will update relevant Directors. This original form will be saved
1873 in the Safeguarding file/Behaviour Watch – Concern/SG module.
- 1874 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the
1875 local Police should be informed immediately as well and they can take immediate protective action as
1876 necessary.
- 1877 • If the matter is a more general concern then ensure that the ‘Action Taken’ log on My Concern is
1878 completed and the form is filed within the Safeguarding file. Either way the form must be signed by the
1879 DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use
1880 Concern/Safeguarding ‘Other’ slip to record concerns which are not related to children/young people,
1881 staff or children/young people and staff.
- 1882 • The relevant concern form should be referenced in the Individual’s **25.01 Index form for Individual**
1883 **concern/safeguarding file** and the site’s **25.07 Central Log of Concerns and Safeguarding**. Services using
1884 My Concern will be able to filter information per chosen criteria and also generate reports per each
1885 child/young person in the school, college, children’s or care homes.
- 1886 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack**
1887 **/Behaviour Watch Concern/SG module**.
- 1888 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed in
1889 writing that the concern is closed and Responsible/Nominated Individual and Regional Education
1890 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is
1891 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off**
1892 **have been completed.** Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the Safeguarding
1893 **file.**
- 1894 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local
1895 Authority and/or the police. The individual can be kept in their care home or on the school/college site
1896 fully supported (e.g. if they are a day student) if advised to do so.
- 1897 • The parent/carers should be informed and a decision should be made with the Local Authority and the
1898 Police about what action is to be taken and whom by.
- 1899 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been
1900 said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an
1901 abuse referral but may help to clarify the situation but they must record all details of any conversation
1902 and advice received on a concern form. He/she can then move to a formal referral or actively monitor
1903 the situation.
- 1904 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or
1905 allegation of abuse directed against anyone working within the establishment. The establishment **MUST**
1906 not internally investigate any allegations of abuse without first taking instruction from the local
1907 Safeguarding Authority/LADO.
- 1908 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal
1909 management investigation (level 2), the investigation process will commence.
- 1910 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the
1911 external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps to
1912 assist the external agency to ensure the investigation is completed without a delay.
- 1913 • Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within
1914 the time frame specified by their regulator. This is regardless of who leads on the investigation and
1915 whether or not the investigation has been concluded.
- 1916 • If as the result of an investigation there has been a substantiated allegation against a member of staff,
1917 we will work with the local Safeguarding Authority/LADO to determine whether there are any
1918 improvements to be made to our safeguarding policy, procedures and practice to prevent similar events

1919 in the future. Also, we will work with our internal Human Resources department and may commence
1920 proceedings under **GHR 27. Disciplinary policy and procedure.**

- 1921 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.
- 1922 Records are kept of all conversations as part of the investigation process and made available as
- 1923 required.

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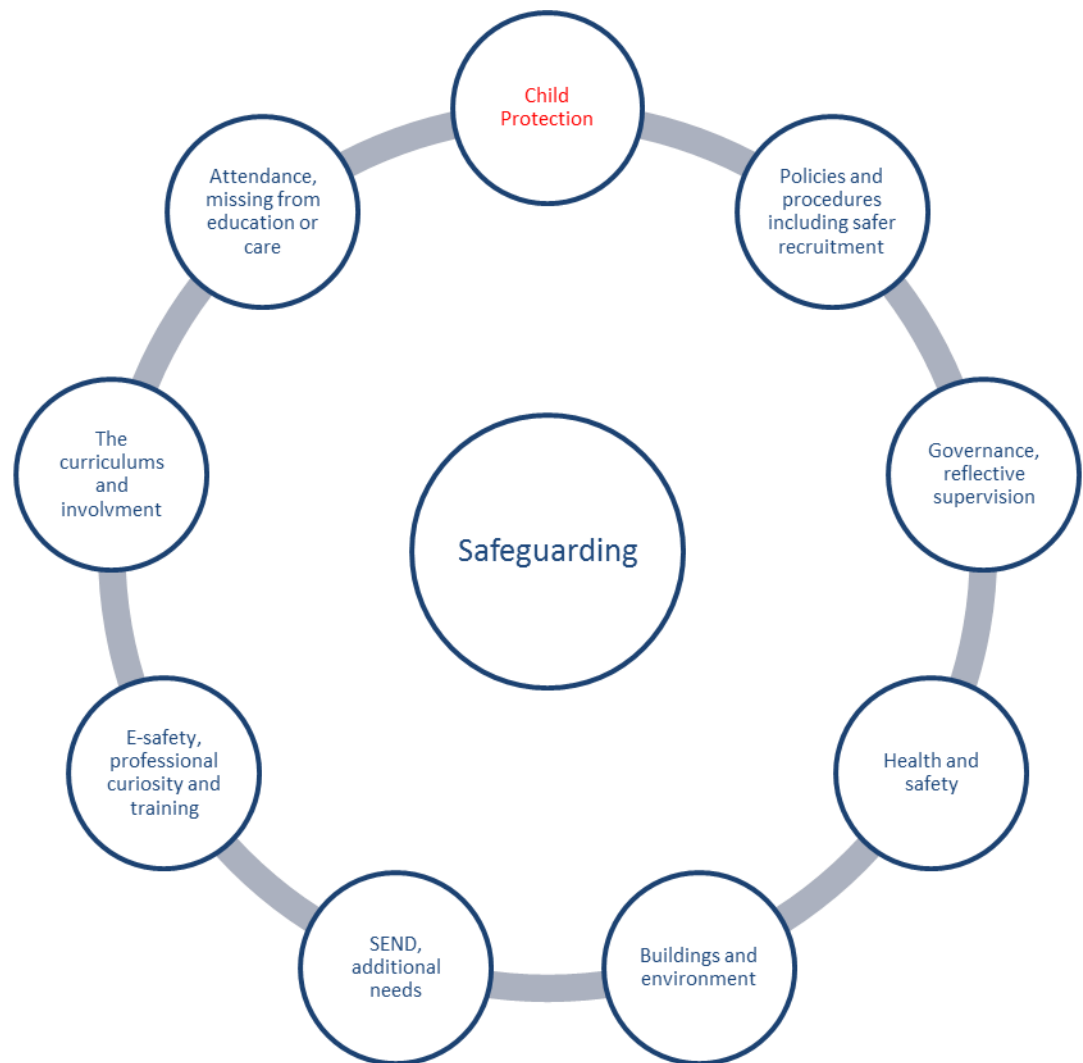


Appendix 9: Key contacts

DSL is Stephen Doughty	
Telephone (24hrs): 07876 791949	Email: Stephen.doughty@cambiangroup.com
DSL Deputy is Carey Chandler	
Telephone (24hrs): 07860 189842	Email: Carey.chandler@cambiangroup.com
Headteacher is Laura Sharman	
Telephone (24hrs): 07860 189713	Email: Laura.sharman@cambiangroup.com
Operations Director is Andrew Sutherland	
Telephone (24hrs): 02087 356150	Email: Andrew.sutherland@caretech-uk.com
Group Executive Director – Children’s Services is Jeremy Wiles	
Telephone: 079190232207	Email: Jeremy.Wiles@caretech-uk.com
Group Lead Safeguarding is Christina Leath (Compliance and Regulation)	
Telephone: 01707 601 800	Email: Christina.Leath@caretech-uk.com
Representative, Proprietor - Caretech Education Services is Andrew Sutherland – Operations Director-Education Services	
Telephone: 07701314378	Email: Andrew.Sutherland@caretech-uk.com
Local authority	
Milton Keynes Local Authority & Milton Keynes Safeguarding Children’s Board	
Milton Keynes Local Authority & Milton Keynes Local Safeguarding Adults’ Board	
Telephone 01908 253169 / 3170	
Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-5:00pm	
Outside of office hours	
James Valley police - The non-emergency police telephone number is: 101.	
For young people under the age of 18:	
The Local Authority Designated Officer (LADO) is Jo Clifford	
Telephone 01908 254300 or 07425 333864. Outside of office hours/weekends, the emergency duty team can be contacted on: 01908 265545.	

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Appendix 10. Safeguarding in children's Services - illustration



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Appendix 11. Low – level concerns (Education)

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

9.2. The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and

- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Sharing Low - level concerns

9.3. Schools must have their site procedure for sharing low-level concerns which is clear, easy to understand and implement.

9.4. Whether all low-level concerns are shared initially with the DSL (or other nominated person for example DSL deputy or with the head teacher/principal is a matter for the school or college to decide. If the former, then the DSL/DSL Deputy should inform the head teacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. **The head teacher/principal should be the ultimate decision maker in respect of all low-level concerns**, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges, the head teacher/principal may wish to consult with the DSL and take a more collaborative decision-making approach. Some schools’ or college’s Head teacher/Principal is also the DSL in which case all low – level concerns should be reported to them or other nominated person for example DSL Deputy).

9.5. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

9.6. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

9.7. Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

9.8. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of

2125 abuse; and ensure that adults working in or on behalf of the school or college are clear about professional
2126 boundaries and act within these boundaries, and in accordance with the ethos and values of the
2127 institution.

2128 **Responding to low - level concerns**

2129 9.9. If the concern has been raised via a third party, the head teacher/principal (or a nominated deputy)
2130 should collect as much evidence as possible by speaking:

- 2131 • directly to the person who raised the concern, unless it has been raised anonymously, and
- 2132 • to the individual involved and any witnesses.

2133 9.10. The information collected will help them to categorise the type of behaviour and determine what further
2134 action may need to be taken. This information needs to be recorded in writing along with the rationale
2135 for their decisions and action taken.

2136 **Recording low - level concerns**

2137 9.11. All low-level concerns should be recorded in writing. The Concern/Safeguarding slip in Behaviour Watch
2138 should be completed, as this is the place to record all concerns being raised. The record should include
2139 details of the concern, the context in which the concern arose, and action taken. The name of the
2140 individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then
2141 that should be respected as far as reasonably possible.

2142 9.12. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or
2143 concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or
2144 college should decide on a course of action, either through its disciplinary procedures or where a pattern
2145 of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be
2146 referred to the LADO.

2147 9.13. Consideration should also be given to whether there are wider cultural issues within the school or college
2148 that enabled the behaviour to occur and where appropriate policies could be revised, or extra training
2149 delivered to minimise the risk of it happening again.

2150 9.14. It is for schools and colleges to decide how long they retain such information, but it is recommended that
2151 it is retained at least until the individual leaves their employment.
2152

2153 **Appendix 12. Further Safeguarding information – what everyone needs to know**

2154 **Contextual safeguarding**

2155 9.15. Contextual Safeguarding is ‘an approach to understanding, and responding to, young people’s
2156 experiences of significant harm beyond their families. It recognises that the different relationships that
2157 young people form in their neighbourhoods, schools, colleges, children’s/care homes and online can
2158 feature violence and abuse. Parents and carers have little influence over these contexts, and young
2159 people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore,
2160 children’s social care practitioners need to engage with individuals and sectors who do have influence
2161 over/within extra- familial contexts, and recognise that assessment of, and intervention with, these
2162 spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the
2163 objectives of child protection systems in recognition that young people are vulnerable to abuse in a range
2164 of social contexts.

2165 9.16. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors
2166 outside the school or college and/or can occur between children outside of these environments. All staff,
2167 but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation
2168 in situations outside their families. Extra-familial harms take a variety of different forms and children can
2169 be vulnerable to multiple harms including (but not limited to) sexual exploitation (including harassment
2170 and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse),
2171 criminal exploitation, and serious youth violence, county lines and radicalisation. Further advice is
2172 provided in the [Home Office’s Preventing youth violence and gang involvement](#) and its [Criminal
2173 exploitation of children and vulnerable adults: county lines guidance](#).

2174 9.17. All staff should be aware that technology is a significant component in many safeguarding and wellbeing
2175 issues. Children are at risk of abuse and other risks online as well as face-to-face. In many cases abuse
2176 and other risks will take place concurrently both online and offline. Children can also abuse other children
2177 online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-
2178 consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images
2179 and pornography, to those who do not want to receive such content.

2180 9.18. Children’s social care assessments should consider where children are being harmed in contexts outside
2181 the home (family home, children’s/care home), so it is important that schools, colleges and
2182 children’s/care homes provide as much information as possible as part of the referral process. This will
2183 allow any assessment to consider all the available evidence and enable a contextual approach to address
2184 such harm. More information about Contextual safeguarding can be found on [NSPCC website](#).

2185 9.19. We will consider the various factors that have an interplay with the life of any child/young person about
2186 whom we have concerns within the setting and the level of influence that these factors have on their
2187 ability to be protected and remain free from harm particularly when it comes to child exploitation or
2188 criminal activity.

2189 9.20. Whilst this term applies to this specific definition, the notion of considering a child/young person within
2190 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the
2191 school, college, children’s/care home gates, within their family home when they visit (children attending
2192 residential education), within the family (day students) and within the community (extracurricular off site
2193 activities, events, groups and clubs) are key considerations when the DSL is looking at any concerns.

2194 **Bullying**

2195 9.21. Our approach to bullying is set out in a separate **0.21. Anti – bullying policy and procedure** acknowledges
2196 that to allow or condone bullying may lead to consideration under child protection procedures. Bullying

2197 is a safeguarding matter that if left unresolved can become a child protection matter. Our settings take
2198 seriously any bullying concerns and both investigate and act to protect Individuals where appropriate.

2199 **Child on child/young adults on young adult/ between children of different age's abuse**

2200 9.22. All staff should be aware that children can abuse other children/young adults can abuse other young
2201 adults and that the abuse can also take place between individuals of different age and that it can happen
2202 both inside and outside of school/college/children's/care home and online. It is important that all staff
2203 recognise the indicators and signs of the abuse and know how to identify it and respond to reports. In
2204 some schools, colleges, children's / care homes site – based or regional members of therapy teams might
2205 need to be involved and support the SLT to identify the most effective ways of communication with the
2206 child/young adult who may have potentially been the victim of child on child/young adult on young adult/
2207 between individuals of different age abuse and who instigated it.

2208 9.23. It must be recognised that children and young people would require varied approaches and
2209 communication mechanisms to be present and available so they can report abuse. Children must be
2210 regularly reassured that their concern/reports will be treated seriously every time they report it.

2211 9.24. Children needs to be told what will happen from the moment their concern is shared, so the lack of
2212 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.
2213 Children need to know that that their concerns will be investigated and dealt with. Child's/young person's
2214 preference in terms of how feedback should be provided must be taken into consideration so this can be
2215 planed for in advance.

2216 9.25. The communication with each individual throughout the process of child on child/young adult on young
2217 adult or between individuals of different age investigation must be regular, proportionate and take place
2218 using suitable communication.

2219 9.26. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn't
2220 receive timely and appropriate support from the school/college, hence the communication and support
2221 must become one of the critical points of a significant priority to those responding to and those managing

2222	child on child/young adult on young adult/between individuals of different age abuse cases including
2223	those of a sexual nature. Other consideration for all providers were:
2224	<ul style="list-style-type: none"> to assume it is happening here and plan accordingly
2225	<ul style="list-style-type: none"> work on and strengthen the whole school, college, children's/care home approach to developing
2226	a safeguarding culture
2227	<ul style="list-style-type: none"> to ensure staff model respectful behaviour
2228	<ul style="list-style-type: none"> to ensure children and young people are clear about acceptable and unacceptable behaviour
2229	<ul style="list-style-type: none"> to ensure children/young people are confident to ask for help
2230	<ul style="list-style-type: none"> to ensure carefully planned and implemented RSHE curriculum
2231	<ul style="list-style-type: none"> to ensure the behavioural approach with sanctions & interventions for poor behaviour
2232	<ul style="list-style-type: none"> to have mechanisms to support students who need it in the way they need it
2233	<ul style="list-style-type: none"> to ensure staff have access to suitable training & that there is clear expectation for staff and
2234	Managers
2235	<ul style="list-style-type: none"> to ensure pupil's voice is heard and responded to
2236	<ul style="list-style-type: none"> to ensure DSLs have some protected time to engage with local safeguarding partners and LADOs,
2237	so those relationships can be strengthened.
2238	<ul style="list-style-type: none"> to ensure staff follow the guidance in Keeping Children Safe in Education
2239	
2240	9.27. All staff should understand that even if there are no reports in their schools or colleges it does not mean
2241	it is not happening, it may be the case that it is just not being reported. As such, it is important if staff
2242	have any concerns regarding child on child/young adult on young adult abuse or abuse between
2243	individuals of different age, they should speak to their DSL (or deputy).
2244	9.28. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and
2245	harassment. Staff must NOT take the view that it doesn't not happen in their setting.
2246	9.29. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but that
2247	all types of abuse between children of the same, similar of different ages is unacceptable and will be

2248 taken seriously. It is essential that all victims are reassured that they are being taken seriously and that
2249 they will be supported and kept safe.

2250 9.30. Abuse between individuals of the same, similar or different age is most likely to include, but may not be
2251 limited to:

- 2252
- 2253 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - 2254 • abuse in intimate personal relationships between peers
 - 2255 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
2256 (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - 2257 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
2258 element which facilitates, threatens and/or encourages sexual violence). For further information about
2259 sexual violence see [Part 5 of KCSIE 2023 and Annex B](#)
 - 2260 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may
2261 be standalone or part of a broader pattern of abuse; For further information about sexual harassment
2262 see [Part 5 of KCSIE 2023 and Annex B](#)
 - 2263 • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch
2264 themselves sexually, or to engage in sexual activity with a third party
 - 2265 • consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as
2266 sexting or youth produced sexual imagery). For more information about this read UKCIS guidance:
2267 [Sharing nudes and semi-nudes advice for education settings](#).
 - 2268 • Upskirting which typically involves taking a picture under a person's clothing without their permission,
2269 with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim
2270 humiliation, distress or alarm; and

2271 9.31. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or
2272 humiliation used as a way of initiating a person into a group and may also include an online element)

2273 9.32. Staff must be clear as to the school's procedures with regards to child on child/young adult on young
2274 adult abuse, abuse between individuals of different age and the important role they have to play in
2275 preventing it and responding where they believe a child may be at risk from it.

2276 9.33. All Individuals will be provided with safeguarding information in a format, which is appropriate for their
2277 understanding and communication. This may take the form of posters or a leaflet/booklet.

2278 9.34. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing
2279 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be
2280 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.
2281 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated or
2282 acceptable. However, it is critical to state that some children with cognitive impairment may not be able
2283 to fully understand how children on the receiving end of such behaviour may feel, therefore staff will
2284 work with each of the children affected by the situation in order to enhance their understanding of the
2285 seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

2286 Serious violence

2287 9.35. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with
2288 serious violent crime. These may include increased absence from school, a change in friendships or
2289 relationships with older individuals or groups, a significant decline in performance, signs of self-harm or
2290 a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new
2291 possessions could also indicate that children have been approached by, or are involved with; individuals
2292 associated with criminal networks or gangs and may be at risk of criminal exploitation.

2293 9.36. All staff should be aware of the range of risk factors which increase the likelihood of involvement in
2294 serious violence, such as being male, having been frequently absent or permanently excluded from
2295 school, having experienced child maltreatment and having been involved in offending, such as theft or

- 2296 robbery. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and
2297 gang involvement and its [Preventing youth violence and gang involvement](#).
- 2298 9.37. Sexual violence and sexual harassment can occur between two or more children of any age and sex, from
2299 primary through to secondary stage and into college. It can occur also through a group of children sexually
2300 assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment
2301 exist on a continuum and may overlap; they can occur online and face-to-face (both physically and
2302 verbally) and are never acceptable. Schools and colleges should be aware of the importance of:
- 2303 • making clear that there is a zero-tolerance approach to sexual violence and sexual harassment
2304 that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”,
2305 “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a
2306 culture of unacceptable behaviour, an unsafe environment and in worst-case scenarios a culture
2307 that normalises abuse, leading to children accepting it as normal and not coming forward to
2308 report it.
 - 2309 • recognising, acknowledging, and understanding the scale of harassment and abuse and that
2310 even if there are no reports it does not mean it is not happening, it may be the case that it is just
2311 not being reported.
 - 2312 • challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts
2313 and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating
2314 such behaviours risks normalising them.
- 2315 9.38. Sexual violence and sexual harassment between children can occur between two children of **any age and**
2316 **sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur through
2317 a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2318 9.39. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful
2319 and distressing. This will, in all likelihood, adversely affect their educational attainment and will be
2320 exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same
2321 children’s/care home. Sexual violence and sexual harassment exist on a continuum and may overlap; they
2322 can occur online and face to face (both physically and verbally) and are never acceptable. All staff working
2323 with children are advised to maintain an attitude of ‘it could happen here’.
- 2324 9.40. It is essential that all victims are reassured that they are being taken seriously and that they will be
2325 supported and kept safe. **A victim should never be given the impression that they are creating a problem**
2326 **by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel ashamed
2327 for making a report.
- 2328 9.41. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that
2329 victims are protected, offered appropriate support and every effort is made to ensure their education is
2330 not disrupted. It is also important that other children, adult students and school and college staff are
2331 supported and protected as appropriate.
- 2332 9.42. There is support available for schools and colleges. [Part 5 of KCSIE 2023 p110](#) provides detailed
2333 information and links to resources.
- 2334 9.43. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with
2335 special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2336 9.44. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm.
2337 However, children who are LGBT can be targeted by other children. In some cases, a child who is

- 2338 perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children
2339 who identify as LGBT.
- 2340 9.45. Risks can be compounded where children/young people who are LGBT lack a trusted adult with whom
2341 they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and
2342 provide a safe space for them to speak out or share their concerns with members of staff.
- 2343 9.46. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health](#)
2344 [Education](#) curriculum and there is a range of support available to help schools counter homophobic,
2345 biphobic and transphobic bullying and abuse.
- 2346 9.47. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to
2347 inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is
2348 developmentally inappropriate and may cause developmental damage. An umbrella term for these types
2349 of behaviour are often referred to as "**harmful sexual behaviour**". The term has been widely adopted in
2350 child protection. Harmful sexual behaviour can occur online and/or offline and can also occur
2351 simultaneously between the two. Harmful sexual behaviour should be considered in a child protection
2352 context.
- 2353 9.48. Situations where children/young people are forced or coerced into sexual activity by peers or associates
2354 can be related with gang / serious youth violence activity but that is not always the case. Peer influence
2355 or peer pressure is a major factor in the decisions made by young people to join particular groups. Many
2356 young people see it as a "way out" from their day-to-day life and feel a strong bond with their peers, one
2357 which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying
2358 include:
- 2359 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and
2360 psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or
2361 worthless because of their colour, ethnicity, culture, faith community, national origin or
2362 national status.
 - 2363 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality
2364 or gender is used as a weapon by boys or girls, this may also include any of the following:
 - 2365 - spreading rumors about someone's alleged sex life
 - 2366 - using offensive terms to describe a person
 - 2367 - inappropriate touching or attempts to do so
 - 2368 - non-consensual sharing of sexual images and videos
 - 2369 - unwanted sexual comments and messages, including those on social media
 - 2370 - any sexual exploitation, coercion and threats
 - 2371 - sexual assault and rape
 - 2372 • **Upskirting** - taking a picture under a person's clothing without their permission and /or
2373 knowledge, with the intention of viewing their genitals or buttocks (with or without
2374 underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
2375 It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism Offences Act,
2376 which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came
2377 into force on 12 April 2019.
 - 2378 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are
2379 transgender, thought to be transgender, or whose gender expression doesn't conform to

- 2380 traditional gender roles. Transphobia can prevent transgender and gender
2381 nonconforming people from living full lives free from harm.
- 2382 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived
2383 sexual orientation);
- 2384 • **Disablist Bullying** - targets a young person solely based on their disability. This can include
2385 manipulative bullying where a perpetrator forces the victim to act in a certain way, or
2386 exploiting a certain aspect of the victim's disability.
- 2387 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect
2388 attitude (usually negative) towards an individual based solely on the individual's
2389 membership of a social group. For example, a person may hold prejudiced views towards
2390 a certain race or gender etc. (e.g. sexist).
- 2391 • **Discrimination** is the behaviour or actions, usually negative, towards an individual or
2392 group of people, especially on the basis of sex/race/social class.
- 2393 9.49. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE 2023 Part 5: Child](#)
2394 [on child sexual violence and harassment](#)
2395 What staff should do if they have concerns about the child/young person
- 2396 9.50. Staff working with children/young people are advised to maintain an attitude of 'it could happen here'
2397 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff
2398 should always act in the best interests of the child/young person
- 2399 9.51. If staff have any concerns about a child's/young person welfare, they should act on them immediately by
2400 following this procedure and reporting their concern to the DSL/DSL Deputy.
- 2401 **Opportunities to teach safeguarding**
- 2402 9.52. Schools/colleges must ensure that their staff undergo regular updated safeguarding training, including
2403 online safety and for children to be taught about how to keep themselves and others safe, including
2404 online, that safeguarding training for staff, including online safety training, is integrated, aligned and
2405 considered as part of the whole school or college safeguarding approach and wider staff training and
2406 curriculum planning.
- 2407 9.53. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities
2408 of individual children/young people, including those who are victims of abuse, and children/young people
2409 with special educational needs or disabilities.
- 2410 9.54. Whilst considering the above training requirements, governance boards and proprietor should have
2411 regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour
2412 effectively to ensure a good and safe educational environment and requires teachers to have a clear
2413 understanding of the needs of all pupils.
- 2414 9.55. Schools and colleges play a crucial role in preventative education. Preventative education is most
2415 effective in the context of a whole-school or college approach that prepares pupils and students for life
2416 in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia,
2417 biphobic and sexual violence/harassment.
- 2418 9.56. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may
2419 cover relevant issues through tutorials). This may include covering relevant issues for schools through
2420 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary
2421 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found
2422 here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health](#)
2423 [education.](#)
- 2424 9.57. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:
2425 [Teaching about relationships sex and health](#). This includes teacher-training modules on the RSHE topics

2426 and non-statutory implementation guidance. The following resources plus many more listed in [Annex B](#),
2427 may also help schools and colleges understand and teach about safeguarding:

- 2428 • DfE advice for schools: [teaching online safety in schools](#);
- 2429 • UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#);
- 2430 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with](#)
2431 [children and young people](#);
- 2432 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum
2433 impact of any online safety sessions delivered by external visitors;
- 2434 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2435 • LGFL '[Undressed](#)' provided schools advice about how to teach young children about being
2436 tricked into getting undressed online in a fun way without scaring them or explaining the
2437 motives of sex offenders.
- 2438 • Public Health England: [Every Mind Matters](#)
- 2439 • [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any
2440 online challenges and hoaxes, sharing information with parents and carers and where to
2441 get help and support.

2442 9.58. Whilst it is essential that governance boards and proprietor ensure that appropriate filters and
2443 monitoring systems are in place, they should be careful that “over blocking” does not lead to
2444 unreasonable restrictions as to what children can be taught with regard to online teaching and
2445 safeguarding

2446 9.59. As schools and colleges increasingly work online, it is essential that children are safeguarded from
2447 potentially harmful and inappropriate online material. Whilst it is essential that governance boards and
2448 proprietor ensure that appropriate filters and monitoring systems are in place, they should be careful
2449 that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with
2450 regard to online teaching and safeguarding

2451 Online safety

2452 9.60. It is essential that children are safeguarded from potentially harmful and inappropriate online material.
2453 An effective whole school and college approach to online safety empowers a school or college to protect
2454 and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify,
2455 intervene in, and escalate any concerns where appropriate.

2456 9.61. The breadth of issues classified within online safety is considerable, but can be categorised into four areas
2457 of risk which we'll refer to as 4Cs later on:

- 2458 • **content:** being exposed to illegal, inappropriate or harmful content, for example:
2459 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation
2460 and extremism.
- 2461 • **contact:** being subjected to harmful online interaction with other users; for example: peer
2462 to peer pressure, commercial advertising and adults posing as children or young adults with
2463 the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- 2464 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for
2465 example, making, sending and receiving explicit images (e.g. consensual and non-

2466 consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit
2467 images and online bullying; and

2468 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or
2469 financial scams. If you feel your pupils, students or staff are at risk, please report it to the
2470 Anti-Phishing Working Group <https://apwg.org/>

2471 9.62. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and
2472 implementing policies and procedures. This will include considering how online safety is reflected as
2473 required in all relevant policies and considering online safety whilst planning the curriculum, any teacher
2474 training, the role and responsibilities of the DSL and any parental engagement.

2475 Online safety policy

2476 9.63. Online safety and the school or college's approach to it should be reflected in the child protection policy.
2477 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college
2478 should have a clear policy on the use of mobile and smart technology. Amongst other things this will
2479 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone
2480 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually
2481 harass their peers via their mobile and smart technology, share indecent images: consensually and non-
2482 consensually (often via large chat groups), and view and share pornography and other harmful content.
2483 Schools and colleges should carefully consider how this is managed on their premises and reflect in their
2484 mobile and smart technology policy and their child protection policy.

2485 9.64. Information and support available to schools and colleges to keep children safe online can be found in
2486 [Part 2 and Annex B of KCSIE 2023](#).

2487 Remote Learning

2488 9.65. The DfE has provided advice to support schools and colleges to help keep pupils, students and staff safe
2489 whilst learning remotely, [safeguarding in schools colleges and other providers](#) and [safeguarding and](#)
2490 [remote education](#). The NSPCC also provide helpful advice - [Undertaking remote teaching safely](#). NSPCC
2491 Learning - [Undertaking remote teaching safely during school closures](#).

2492 9.66. Schools and colleges are likely to be in regular contact with parents and carers. Those communications
2493 should be used to reinforce the importance of children being safe online and parents and carers are likely
2494 to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It
2495 will be especially important for parents and carers to be aware of what their children are being asked to
2496 do online, including the sites they will asked to access and be clear who from the school or college (if
2497 anyone) their child is going to be interacting with online

2498 Filters and monitoring

2499 9.67. Whilst considering their responsibility to safeguard and promote the welfare of children and provide
2500 them with a safe environment in which to learn, governance boards and proprietor should be doing all
2501 that they reasonably can to limit children's exposure to the above risks from the school's or college's IT
2502 system. As part of this process, governance boards and proprietor should ensure their school or college
2503 has appropriate filters and monitoring systems in place. Governance boards and proprietor should
2504 consider the age range of their children, the number of children, how often they access the IT system and
2505 the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech IT team and
2506 seek advice and support required.

2507 9.68. The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges
2508 and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK Safer Internet

2509 Centre has published guidance as to what “appropriate” filtering and monitoring might look like UK Safer
2510 Internet Centre: [appropriate filtering and monitoring](#).

2511 **Information security and access management**

2512 9.69. Education settings are directly responsible for ensuring they have the appropriate level of security
2513 protection procedures in place, in order to safeguard their systems, staff and learners and review the
2514 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
2515 Guidance on e-security is available from the National Education Network. In addition, broader guidance
2516 on cyber security including considerations for governors and trustees can be found at NCSC.GOV.UK.

2517 **Reviewing online safety**

2518 9.70. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should
2519 consider carrying out an annual review of their approach to online safety, supported by an annual risk
2520 assessment that considers and reflects the risks their children face. A free online safety self-review tool
2521 for schools can be found via the [360 safe website](#).

2522 9.71. UKCIS has published [online safety in schools and colleges: Questions from the governing board](#). The
2523 questions can be used to gain a basic understanding of the current approach to keeping children safe
2524 online; learn how to improve this approach where appropriate; and find out about tools, which can be
2525 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of
2526 trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development
2527 and monitoring.

2528 **Cyberbullying**

2529 9.72. Central to Anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all
2530 children/young people have a right not to be bullied’. School also recognises that it must take note of
2531 bullying perpetrated outside school which spills over into the school; therefore once aware services will

2532 respond to any cyber-bullying we become aware of carried out by children/young people when they are
2533 away from the site.

2534 9.73. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using
2535 electronic forms of contact repeatedly over time against a victim who cannot easily defend
2536 himself/herself.’

2537 • By cyber-bullying, we mean bullying by electronic media:

2538 • Bullying by texts or messages or calls on mobile ‘phones

2539 • The use of mobile ‘phone cameras to cause distress, fear or humiliation

2540 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,
2541 personal websites, social networking sites

2542 • Using e-mail to message others

2543 • Hijacking/cloning e-mail accounts

2544 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2545 9.74. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory
2546 information in any media including internet sites.

2547 9.75. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public
2548 electronic communications network, a message or other matter that is grossly offensive or one of an
2549 indecent, obscene or menacing character.

2550 9.76. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct
2551 amounting to harassment.

2552 9.77. If services become aware of any incidents of cyberbullying, they will need to consider each case
2553 individually as to any criminal act that may have been committed. The services will pass on information
2554 to the police if it feels that it is appropriate or is required to do so.

2555 **Gaming – raising awareness**

2556 9.78. Online gaming is an activity in which the majority of children and young people and many adults get
2557 involved. The services will raise awareness by talking to children/young people/key workers/staff and
2558 also where appropriate parents/carers involved about the games their children play and help them
2559 identify whether they are appropriate.

2560 **Nudes/semi nudes’ images or videos**

2561 9.79. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others,
2562 or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops -
2563 any device that enables the sharing of media and messages. Sexting may also be called: trading nudes,
2564 dirties, pic for pic.

2565 9.80. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the
2566 person doing it is a child. A young person is breaking the law if they:

2567 • take an explicit photo or video of themselves or a friend

2568 • share an explicit image or video of a child, even if it’s shared between children of the same age

2569 • possess, download or store an explicit image or video of a child, even if the child gave their permission
2570 for it to be created.

2571 9.81. However, if a young person is found creating or sharing images, the police can choose to record that a
2572 crime has been committed but that taking formal action isn't in the public interest. There are many

2573 reasons why a young person may want to send a naked or semi-naked picture, video or message to
2574 someone else:

- 2575 • joining in because they think that ‘everyone is doing it’
- 2576 • boosting their self-esteem
- 2577 • flirting with others and testing their sexual identity
- 2578 • exploring their sexual feelings
- 2579 • to get attention and connect with new people on social media
- 2580 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the person
2581 asking is persistent

2582 9.82. The risks of sexting are that the young person has no control over the images and how these are shared,
2583 and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide
2584 education and guidance to prevent individuals from becoming victims of such situations by encouraging
2585 them to think about the risk of sexting and understand how to seek help when approached to take part
2586 in sexting. More information can be found on [Keeping-children-safe/online-safety/sexting-sending-
2587 nudes](#).

2588 **Online reputation**

2589 9.83. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed
2590 by posts, photos that have been uploaded and comments made by others on people’s profiles. It is
2591 important that children/young people and staff are aware that anything that is posted could influence
2592 their future professional reputation. The majority of organisations and work establishments now check
2593 digital footprint before considering applications for positions or places on courses.

2594 **Grooming**

2595 9.84. On-line grooming is the process by which one person with an inappropriate sexual interest in
2596 children/young people will approach a child/young person on-line, with the intention of developing a

2597 relationship with that child/young person, to be able to meet them in person and intentionally cause
2598 harm.

2599 9.85. The services will build awareness amongst children/young people, parents/carers and staff about
2600 ensuring that the child/young person:

2601 • Only has friends on-line that they know in real life

2602 • Is aware that if they communicate with somebody that they have met on-line, that relationship should
2603 stay on-line.

2604 9.86. Where appropriate that the services will support parents/carers to:

2605 • Recognise the signs of grooming

2606 • Have regular conversations with their children/young people about on-line activity and how to stay
2607 safe on-line

2608 9.87. Where appropriate the services will raise awareness by:

2609 • Regular communication with the families

2610 • Schools/colleges will include awareness around grooming as part of their curriculum

2611 • Identifying with the families and children/young people how they can be safeguarded against
2612 grooming.

2613 **Violence against women and girls (VAWG)**

2614 9.88. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women
2615 and girls. The government has a strategy looking at specific issues that women and girls face.

2616 9.89. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to
2617 equal participation of women and men in social, economic, and political spheres. Such violence impedes
2618 gender equality and the achievement of a range of development outcomes. VAWG is a complex and
2619 multifaceted problem that cannot effectively be addressed from a single vantage point. The prevention
2620 of and response to such violence require coordinated action across multiple sectors.
2621

2622 **Female genital mutilation (FGM)**

2623 9.90. FGM comprises all procedures involving partial or total removal of the external female genitalia or other
2624 injury to the female genital organs for non-medical reasons, hence interferes with the natural function of
2625 girls and women's bodies. It has no health benefits and harms girls and women in many ways.

2626 9.91. The age at which girls undergo FGM varies enormously according to the community in which they live.
2627 The procedure may be carried out when the girl is new born, during childhood or adolescence, just before
2628 marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place
2629 between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

2630 9.92. In 2003, FGM became a criminal offence for UK nationals or permanent UK residents to take their child
2631 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty
2632 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

2633 **Forced marriage**

2634 9.93. In the case of children and young people: 'a forced marriage is a marriage in which one or both spouses
2635 cannot consent to the marriage and duress is involved. Duress can include physical, psychological,

2636 financial, sexual and emotional pressure.’ In developing countries, approx. 11% of girls are married before
2637 the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2638 9.94. It is important that all members of staff recognise the presenting symptoms, know how to respond if
2639 there are concerns and where to turn for advice.

2640 9.95. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**
2641 and locally through the local police safeguarding team or children’s social care.

2642 9.96. While all members of staff (education, care, clinical) have important responsibilities with regard to
2643 children, young people or adults who may be at risk of forced marriage, managers and leaders should not
2644 undertake roles in this regard that are most appropriately discharged by other children’s services
2645 professionals such as police officers or social workers.

2646 9.97. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced
2647 marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory
2648 guidance for dealing with forced marriage, which can both be found at [The Right to Choose: Multi-agency
2649 statutory guidance for dealing with forced marriage](#). School staff can contact the Forced Marriage Unit if
2650 they need advice or information: Contact: 020 7008 0151 or email fmufcdo.gov.uk.

2651 **Breast ironing**

2652 9.98. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's
2653 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically
2654 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and
2655 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue
2656 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where
2657 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports
2658 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used
2659 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2660 9.99. Any suspected cases of breast ironing MUST be reported immediately under this Child Protection and
2661 Safeguarding policy and the Individual offered medical help.

2662 **Teenage relationship abuse**

2663 9.100. Research has shown that teenagers don’t readily understand what constitutes abusive behaviour such as
2664 controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them
2665 what to wear, who they can/can't see or speak to and that this abuse is prevalent within teen
2666 relationships.

2667 9.101. Further research shows that teenagers don’t understand what consent means within their relationships.
2668 They often hold the common misconception that rape can only be committed by a stranger down a dark
2669 alley and don’t understand that it could happen within their own relationships. This can lead to these
2670 abusive behaviours feeling ‘normal’ and therefore unchallenged, as they are not recognised as being
2671 ‘abusive’.

2672 9.102. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their
2673 own, their peers or others behaviour towards them. Therefore, significant effort will be made to raise
2674 awareness of it and respond effectively to such situations.

2675 9.103. In response to this Cambian Group will provide education and guidance to prevent teenagers from
2676 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views of
2677 violence, abuse and controlling behaviours, and understand what consent means within relationships.

2678 **Honour-based violence**

2679 9.104. It is often linked to family members or acquaintances who mistakenly believe someone has brought
2680 shame to their family or community by doing something that is not in keeping with the traditional beliefs
2681 of their culture. However, abuse committed in the context of preserving “honour” often involves a wider
2682 network of family or community pressure and can include multiple perpetrators. It is important to be

2683 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take”
2684 for example, honour-based violence might be committed against individuals who:

- 2685 • become involved with a boyfriend or girlfriend from a different culture or religion
- 2686 • want to get out of an arranged marriage
- 2687 • want to get out of a forced marriage
- 2688 • wear clothes or take part in activities that might not be considered traditional within a particular
2689 culture.

2690 9.105. Girls and women are the most common victims of honour-based violence however; it can also affect men
2691 and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’
2692 might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced
2693 marriage, being held against their will or taken somewhere they don’t want to go.

2694 9.106. If staff believe that the Individual is at risk from honour-based violence, the DSL will follow the usual
2695 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is
2696 at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on
2697 teachers. It is important that if honour-based violence is known or suspected, communities and family
2698 members must NOT be contacted prior to referral to the police or social care as this could increase the
2699 risk to the individual.

2700 Preventing extremism and radicalisation

2701 9.107. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism
2702 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**
2703 **Extremism and Radicalisation policy** and **0.27 E-safety policy**, we all need to be vigilant in ensuring the
2704 safety from extremist and terrorist material when accessing the internet. We consider Milton Keynes
2705 Local Authority Safeguarding Children’s Board arrangements to fulfil its Prevent duties.

2706 9.108. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other
2707 forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges’
2708 safeguarding approach.

- 2709 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the
2710 rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
2711 This also includes calling for the death of members of the armed forces.

- 2712 • **Radicalisation** refers to the process by which a person comes to support terrorism and extremist
2713 ideologies associated with terrorist groups.

- 2714 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes
2715 serious damage to property; or seriously interferes or disrupts an electronic system. The use or
2716 threat **must** be designed to influence the government or to intimidate the public and is made
2717 for the purpose of advancing a political, religious or ideological cause.

2718 9.109. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
2719 Background factors combined with specific influences such as family and friends may contribute to a
2720 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social
2721 media or the internet) and settings (such as within the home).

2722 9.110. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent
2723 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to
2724 changes in children’s behaviour, which could indicate that they may be in need of help or protection.

2725 Staff should use their judgement in identifying children who might be at risk of radicalisation and act
2726 proportionately which may include making a Prevent referral.

2727 9.111. The school's or college's DSL (and any deputies) should be aware of local procedures for making a Prevent
2728 referral

2729 9.112. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act
2730 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent
2731 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2732 9.113. [An online general awareness-training module on Channel is available](#). The module is suitable for school
2733 staff and other front-line workers. It introduces the topics covered by this advice, including how to
2734 identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types
2735 of intervention that may be appropriate, in addition to Channel.

2736 **Prevent Duty**

2737 9.114. The Prevent duty should be seen as part of schools and colleges' wider safeguarding obligations. DSLs
2738 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance
2739 for England & Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also
2740 covers childcare). DSLs and other senior leaders in colleges should familiar themselves with the [Prevent
2741 duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms
2742 of four general themes: risk assessment, working in partnership, staff training, and IT policies.

2743 9.115. Local authorities will be expected to ensure appropriate frontline staff, including those of its contractors,
2744 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into terrorism
2745 and are aware of available programmes to deal with this issue.

2746 9.116. As the independent body responsible for standards and quality improvement for further education, the
2747 Education and Training Foundation will work with the sector to ensure that appropriate training is
2748 available. This will include and draw from training provided through the network of Prevent co-
2749 ordinators.

2750 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

2751 9.117. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2752 9.118. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an
2753 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity,
2754 in exchange for something the victim needs or wants, and/or for the financial advantage or increased
2755 status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can
2756 affect children, both male and female and can include children who have been moved (commonly
2757 referred to as trafficking) for the purpose of exploitation.

2758 **Child Criminal Exploitation (CCE)**

2759 9.119. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or
2760 money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be
2761 forced or manipulated into committing vehicle crime or threatening/committing serious violence to
2762 others. Children can become trapped by this type of exploitation as perpetrators can threaten victims
2763 (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying
2764 weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As
2765 children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims
2766 is not always recognised by adults and professionals, (particularly older children), and they are not
2767 treated as victims despite the harm they have experienced. They may still have been criminally exploited
2768 even if the activity appears to be something they have agreed or consented to.

2769 9.120. It is important to note that the experience of girls who are criminally exploited can be very different to
2770 that of boys. The indicators may not be the same; however, professionals should be aware that girls are

2771 at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally
2772 exploited may be at higher risk of sexual exploitation.

2773 **Child Sexual Exploitation (CSE)**

2774 9.121. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by
2775 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing,
2776 and touching outside clothing. It may include noncontact activities, such as involving children in the
2777 production of sexual images, forcing children to look at sexual images or watch sexual activities,
2778 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for
2779 abuse including via the internet.

2780 9.122. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate
2781 knowledge e.g. through others sharing videos or images of them on social media.

2782 9.123. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17
2783 year olds who can legally consent to have sex. Some children may not realise they are being exploited
2784 e.g. they believe they are in a genuine romantic relationship.

2785 9.124. Children with learning difficulties can be particularly vulnerable to exploitation as can children from
2786 particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual
2787 emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who
2788 go missing from home or school, children involved in crime, children with parents/carers who have
2789 mental health problems, learning difficulties/other issues, children who associate with other children
2790 involved in exploitation. However, it is important to recognise that any child can be targeted.

2791 9.125. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors
2792 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or
2793 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants
2794 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or
2795 facilitator.

2796 9.126. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of
2797 18 years, including 16- and 17-year olds who can legally consent to have sex) or adults. It is critical to
2798 know that children/young people may also be exploited by other children/young people, who themselves
2799 may be experiencing exploitation – where this is the case, it is important that the child/young person
2800 perpetrator is also recognised as a victim.

2801 9.127. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic
2802 to complex organised abuse. It can involve force and/or enticement-based methods of compliance and
2803 may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when
2804 activity appears consensual and it should be noted exploitation as well as being physical can be facilitated

2805 and/or take place online. More information include definitions and indicators are included in [KCSIE 2023-](#)
2806 Some of the following can be indicators of both child criminal and sexual exploitation where children:

- 2807 • appear with unexplained gifts or new professions;
- 2808 • associate with other young people involved in exploitation;
- 2809 • suffer from changes in emotional well-being;
- 2810 • misuse drugs and alcohol;
- 2811 • go missing for periods of time or regularly or come home late; and
- 2812 • regularly miss school or education or do not take part in education.

2813 9.128. Some additional specific indicators that may be present in CSE and children who:

- 2814 • Children who have older boyfriends or girlfriends; and
- 2815 • Children who suffer from sexually transmitted infections, display sexual behaviours
2816 beyond expected sexual development or become pregnant.

2817 9.129. Further information on signs of a child's involvement in sexual exploitation is available in Home Office
2818 guidance: Child sexual exploitation: guide for practitioners.

2819 9.130. As an organisation we do recognise that the same level of exploitation may take place involving
2820 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged 18
2821 years or over and at risk of abuse or neglect because of their needs for care and/or support (The Care Act
2822 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is expected that
2823 the above statement will equally apply to those who are 18+ across England and Wales.

2824 9.131. Children under the age of criminal responsibility (under the age of 10), or young people who have
2825 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into criminal
2826 activity provide opportunity for criminals to distance themselves from crime.

2827 County Lines

2828 9.132. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal
2829 drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as
2830 well as across the UK - no specified distance of travel is required. Children and vulnerable adults are
2831 exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation,
2832 violence (including sexual violence) and weapons to ensure compliance of victims. Children can be
2833 targeted and recruited. Exploitation is an integral part of the county lines, children may become victims
2834 through: coercion, intimidation, violence (including sexual) and weapons.

2835 9.133. Children can be targeted and recruited into county lines in a number of locations including schools,
2836 further and higher educational institutions, pupil referral units, special educational needs schools,
2837 children's homes and care homes. Children are often recruited to move drugs and money between
2838 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed
2839 internally to avoid detection. Children can easily become trapped by this type of exploitation as county
2840 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their
2841 families) if they attempt to leave the county lines network.

2842 9.134. Children are also increasingly being targeted and recruited online using social media. Children can easily
2843 become trapped by this type of exploitation as county lines gangs can manufacture drug debts which
2844 need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they
2845 attempt to leave the county lines network. These children and young people are at serious risk of
2846 criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group who may not

2847 necessarily be affiliated to a gang, but who have developed networks across geographical boundaries to
2848 access and exploit existing drugs markets in these areas.

2849 9.135. The group, or individuals exploited by them, travel regularly between the urban hub and the rural
2850 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply
2851 but is generally more frequent and in smaller deal amounts compared to most other drug supply
2852 methods.

2853 9.136. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are
2854 involved in county lines. Some additional specific indicators that may be present where a child is
2855 criminally exploited through involvement in county lines are children who:

- 2856 • go missing and are subsequently found in areas away from their home;
- 2857 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 2858 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and
2859 collecting money for drugs;
- 2860 • are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid
2861 detection;
- 2862 • are found in accommodation that they have no connection with, often called a 'trap house or
2863 cuckooing' or hotel room where there is drug activity;
- 2864 • owe a 'debt bond' to their exploiters;
- 2865 • have their bank accounts used to facilitate drug dealing.

2866 9.137. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be
2867 considered alongside consideration of availability of local services/third sector providers who offer
2868 support to victims of county lines exploitation.

2869 9.138. Further information on the signs of a child's involvement in county lines is available in guidance published
2870 by the [Home Office and The Children's Society County Lines Toolkit for Professional](#).

2871 Cuckooing

2872 9.139. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation
2873 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to
2874 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to as
2875 cuckooing.

2876 9.140. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to
2877 use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem

- | | |
|------|---|
| 2906 | <ul style="list-style-type: none"> it is an offence to threaten or cause harm to a person with a bladed weapon |
| 2907 | <ul style="list-style-type: none"> some bladed weapons are prohibited from being sold or purchased, including to anyone |
| 2908 | <ul style="list-style-type: none"> under the age of 18 |
| 2909 | <ul style="list-style-type: none"> offences such as robbery or assault can be aggravated if a knife is involved |
| 2910 | <ul style="list-style-type: none"> it is also an offence to carry a knife in a public place without good reason. |
| 2911 | <ul style="list-style-type: none"> It is clear that knife crime is an increasing safeguarding risk to children and young people, |
| 2912 | <ul style="list-style-type: none"> both at school and in their local communities. While Ofsted have not sought to answer the |

2913 question of the causes of knife crime, leaders told Ofsted that, in their experience, children
2914 are in three categories of risk of knife carrying.

2915 9.146. The highest level of risk is for those children who have been groomed into gangs, for the purposes of
2916 criminal exploitation.

2917 9.147. Underneath this lies a group of children who have witnessed other children carrying knives, have been
2918 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or
2919 who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on
2920 social media.

2921 9.148. Then there are children who carry knives to school as an isolated incident. For example, they may carry
2922 a penknife that a grandparent has gifted them

2923 9.149. It is important to remember that knife crime does not exist in a vacuum and children who are victims or
2924 perpetrators may also be experiencing multiple vulnerabilities.

2925 9.150. Some children and young people can be more at risk of being drawn into criminality; multiple studies
2926 demonstrate a clear link between inequality and high rates of violence for example. There is a need to
2927 both understand and address individual risk factors as well as address the social challenges that underpin
2928 criminal exploitation and serious violence in our communities, from poor mental health, addiction,
2929 poverty, unemployment and poor-quality housing.

2930 **Missing young people and the link between missing and county lines**

2931 9.151. Every precaution is taken through the use of risk assessments and thorough planning and supervision to
2932 ensure that children, young people and young adults are safe both at school, college, home, and on
2933 outings. If a child, young person or young adult goes missing from our Location, it is considered a potential
2934 indicator of abuse or neglect.

2935 9.152. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of
2936 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to attend
2937 school regularly or has been absent without the school's permission for a continuous period of 10 days
2938 or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs
2939 such as travelling to conflict zones, FGM and forced marriage.

2940 9.153. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them
2941 towards going missing and becoming involved in criminal activities. Some individuals may be pulled
2942 towards exploitation through the promise of money, gifts, affection and status. However, they may be
2943 then be forced to work for these people as they are coerced into believing that they are indebted to
2944 them.

2945 **Domestic abuse**

2946 9.154. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever
2947 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as
2948 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of
2949 domestic abuse, based on the previous cross-government definition, ensures that different types of
2950 relationships are captured, including ex-partners and family members. The definition captures a range of
2951 different abusive behaviours, including physical, emotional and economic abuse and coercive and
2952 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the
2953 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as
2954 defined in section 2 of the 2021 Act).

2955 9.155. Types of domestic abuse include intimate partner violence, abuse by family members, teenage
2956 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of

- 2957 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and
2958 domestic abuse can take place inside or outside of the home.
- 2959 9.156. All children can witness and be adversely affected by domestic abuse in the context of their home life
2960 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence
2961 can have a serious, long lasting emotional and psychological impact on children. In some cases, a child
2962 may blame themselves for the abuse or may have had to leave the family home as a result.
- 2963 9.157. Young people can also experience domestic abuse within their own intimate relationships. This form of
2964 abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young
2965 people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or
2966 both parties are under 16). However, as with any child under 18, where there are concerns about safety
2967 or welfare, child safeguarding procedures should be followed and both young victims and young
2968 perpetrators should be offered support.
- 2969 9.158. KCSIE2022 introduces additional information about domestic abuse which can encompass a wide range
2970 of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited
2971 to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They
2972 may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own
2973 intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term
2974 impact on their health, well-being, development, and ability to learn.
- 2975 9.159. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work
2976 together to provide emotional and practical help to children. The system ensures that when police are
2977 called to an incident of domestic abuse, where there are children in the household who have experienced
2978 the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or
2979 children arrive at school the following day. This ensures that the school has up to date relevant
2980 information about the child's circumstances and can enable immediate support to be put in place,
2981 according to the child's needs. Operation Encompass does not replace statutory safeguarding
2982 procedures. Where appropriate, the police and/or schools should make a referral to children's social care
2983 if they are concerned about a child's welfare. More information about the scheme and how schools can
2984 become involved is available on the Operation Encompass website.
- 2985 9.160. Operation Encompass provides an advice and helpline service for all staff members from educational
2986 settings who may be concerned about children who have experienced domestic abuse. The helpline is
2987 available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).
- 2988 9.161. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence,
2989 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well
2990 as those who are worried about friends and loved ones. It also has a form through which a safe time from

2991 the team for a call can be booked. Additional advice on identifying children who are affected by domestic
2992 abuse and how they can be helped is available at:

- 2993 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 2994 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 2995 • [Saflives: young people and domestic abuse.](#)
- 2996 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes
2997 information for adult victims, young people facing abuse in their own relationships and
2998 parents experiencing child to parent violence/abuse)
- 2999 • Home : [Operation Encompass](#) (includes information for schools on the impact of domestic
3000 abuse on children)

3001 **Serious Violent Crime**

3002 9.162. All staff should be aware of indicators, which may signal that children are at risk from, or are involved
3003 with serious violent crime. These may include:

- 3004 • increased absence from school with a significant decline in performance,
- 3005 • a change in friendships or relationships with older individuals or group,
- 3006 • signs of self-harm or a significant change in well-being, or signs of assault or
3007 unexplained injuries,
- 3008 • unexplained gifts or new possessions could also indicate that children have been
3009 approached by, or are involved with individuals associated with criminal networks or
3010 gangs.

3011 9.163. All staff should be aware of the associated risks and understand the measures in place to measure these.
3012 Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang
3013 involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance -](#)
3014 [September 2018.](#)

3015 **Mental Health**

3016 9.164. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing
3017 of young people. All staff should be aware that mental health problems can, in some cases, be an indicator
3018 that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

3019 9.165. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying
3020 possible mental health problems, including routes to escalate and clear referral and accountability
3021 systems.

3022 9.166. The Department is providing funding to support costs of a significant training program for senior mental
3023 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will be
3024 available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school
3025 or college approach to mental health.

3026 9.167. Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem.
3027 Staff however, are well placed to observe children day-to-day and identify those whose behaviour
3028 suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff
3029 suspect this might be the case they should report their concerns to a senior leader within the school and
3030 if possible bring their concerns to a member of the clinical team.

3031 9.168. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood
3032 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is

- 3033 key that staff receive appropriate education and training so that they are aware of how these children's
3034 experiences, can impact on their mental health, behaviour and education.
- 3035 9.169. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action
3036 should be taken. Staff should follow their child protection policy and speak immediately to the DSL or a
3037 deputy.
- 3038 9.170. Schools and colleges can access a range of advice to help them identify children in need of extra mental
3039 health support; this includes working with external agencies. More information can be found in the
3040 [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best
3041 practice. Public Health England has produced a range of resources to support secondary school teachers
3042 to promote positive health, wellbeing and resilience among children.
- 3043 9.171. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful
3044 for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out how schools
3045 and colleges can help prevent mental health problems by promoting resilience as part of an integrated,
3046 whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their
3047 pupils.
- 3048 9.172. In addition, Public Health England has produced a range of resources to support secondary schools to
3049 promote positive health, wellbeing and resilience among children including its guidance Promoting
3050 children and young people's emotional health and wellbeing. Its resources include social media, forming
3051 positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The
3052 Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff
3053 with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our

3054 [Wellbeing for education recovery program](#) content, which covers issues such as bereavement, loss,
3055 anxiety, stress and trauma.

3056 Human trafficking

3057 9.173. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a process
3058 that is a combination of:

- 3059 - Movement (including within the UK);
- 3060 - Control, through harm / threat of harm or fraud
- 3061 - For the purpose of exploitation

3062 9.174. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming
3063 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a
3064 life of abuse, servitude and inhumane treatment.

3065 9.175. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is
3066 significant evidence that children/young people/young adults (both of UK and other citizenship) are being
3067 trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

3068 9.176. There are a number of indicators which suggest that a child/young person/young adult may have been
3069 trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as
3070 follows:

- 3071 - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted
3072 infection or has an unwanted pregnancy
- 3073 - Has a history with missing links and unexplained moves
- 3074 - Is required to earn a minimum amount of money every day
- 3075 - Works in various locations
- 3076 - Has limited freedom of movement
- 3077 - Appears to be missing for periods
- 3078 - Is known to beg for money
- 3079 - Is being cared for by adult/s who are not their parents and the quality of the
3080 relationship between the child and their adult carers is not good
- 3081 - Is one among a number of unrelated children found at one address
- 3082 - Has not been registered with or attended a GP practice
- 3083 - Is excessively afraid of being deported.

3084 9.177. For those children/young people/young adults who are internally trafficked within the UK indicators
3085 include:

- 3086 - Physical symptoms (bruising indicating either physical or sexual assault)
- 3087 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 3088 - Reports from reliable sources suggesting the likelihood of involvement in
- 3089 - Sexual exploitation / the child has been seen in places known to be used for sexual
3090 exploitation
- 3091 - Evidence of drug, alcohol or substance misuse

- 3092 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or
- 3093 borrowing clothing from older people
- 3094 - Relationship with a significantly older partner
- 3095 - Accounts of social activities, expensive clothes, mobile phones or other possessions
- 3096 with no plausible explanation of the source of necessary funding
- 3097 - Persistently missing, staying out overnight or returning late with no plausible
- 3098 explanation
- 3099 - Returning after having been missing, looking well cared for despite having not been
- 3100 at home
- 3101 - Having keys to premises other than those known about
- 3102 - Low self- image, low self-esteem, self-harming behaviour including cutting,
- 3103 overdosing, eating disorder, promiscuity
- 3104 - Truancy / disengagement with education
- 3105 - Entering or leaving vehicles driven by unknown adults
- 3106 - Going missing and being found in areas where the child/young person/young adult
- 3107 has no known links; and/or
- 3108 - Possible inappropriate use of the internet and forming on-line relationships,
- 3109 particularly with adults/other adults.

3110 9.178. These behaviours themselves do not indicate that an Individual is being trafficked, but should be
3111 considered as indicators that this may be the case.

3112 **Child abduction and community safety incidents**

3113 9.179. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal
3114 responsibility for the child. Child abduction can be committed by parents or other family members; by
3115 people known but not related to the victim (such as neighbours, friends and acquaintances); and by
3116 strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst
3117 children and parents, for example, people loitering nearby or unknown adults engaging children in
3118 conversation.

3119 9.180. As children get older and are granted more independence (for example, as they start walking to school
3120 on their own), it is important they are given practical advice on how to keep themselves safe. Many
3121 schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons
3122 focus on building children's confidence and abilities rather than simply warning them about all strangers.
3123 Further information is available at: <http://www.actionagainstabduction.org/> and
3124 <https://clevernevergoes.org/>

3125 **Modern slavery and the National Referral Mechanism**

3126 9.181. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
3127 Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced
3128 criminality and the removal of organs.

3129 9.182. When considering modern slavery, there is a perception that this is taking place overseas. The
3130 government estimates that tens of thousands of slaves are in the UK today.

3131 9.183. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,
3132 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from

3133 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been
3134 rescued within the UK.

3135 9.184. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be
3136 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.

3137 9.185. Further information on the signs that someone may be a victim of modern slavery, the support available
3138 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
3139 Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

3140 Cybercrime

3141 9.186. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised
3142 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line)
3143 or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes
3144 include:

- 3145 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer
3146 network to look for test paper answers or change grades awarded;
- 3147 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,
3148 network or website unavailable by overwhelming it with internet traffic from multiple sources;
3149 and
- 3150 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,
3151 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,
3152 including those above.

3153 9.187. Children with particular skill and interest in computing and technology may inadvertently or deliberately
3154 stray into cyber-dependent crime.

3155 9.188. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the
3156 Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led
3157 by the National Crime Agency, working with regional and local policing. It aims to intervene where young
3158 people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert
3159 them to a more positive use of their skills and interests.

3160 9.189. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of
3161 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line
3162 bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

3164 Initiation/Hazing

3165 9.190. Hazing is a form of initiation ceremony, which is used to induct newcomers into an organisation such as
3166 a private school, sports team etc. There are a number of different forms, from relatively mild rituals to
3167 severe and sometimes violent ceremonies in gangs/criminal groups.

3168 9.191. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials, which
3169 promote a bond between them. After the hazing is over, the newcomers also have something in common

3170 with older members of the organisation, because they all experienced it as part of a rite of passage. Many
3171 rituals involve humiliation, embarrassment, abuse, and harassment.

3172 9.192. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour
3173 and raise awareness of such within all services.
3174

3175 **Safeguarding issues relating to Individual children and young people needs**

3176 **Homelessness**

3177 9.193. As an organisation we recognise that being homeless or being at risk of becoming homeless presents a
3178 real risk to a child's/young person welfare. The impact of losing a place of safety and security can affect
3179 an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress
3180 concerns at the earliest opportunity.

3181 9.194. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing
3182 Authority for the parent/guardians in order to raise/progress concerns.

3183 9.195. In most cases school and college, colleagues will be considering homelessness in the context of children
3184 who live with their families, and intervention will be on that basis. However, it should also be recognised
3185 in some cases 16 and 17 year olds could be living independently from their parents or guardians, for
3186 example through their exclusion from the family home, or other reasons. This will require a different level
3187 of intervention and support. Children's services will be the lead agency for these young people and the
3188 DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The
3189 department and the Ministry of Housing, Communities and Local Government have published joint
3190 statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless
3191 and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3192 9.196. Guidance on how local authorities should exercise their homelessness functions in accordance with the
3193 Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local
3194 authorities](#).

3195 9.197. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young
3196 people and the DSL should ensure appropriate referrals are made based on the Individual's
3197 circumstances.

3198 9.198. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be
3199 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding
3200 Authority where an Individual has been harmed or is at risk of harm.

3201 **Private Fostering**

3202 9.199. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be
3203 cared for by another adult who is not closely related and is not a legal guardian with parental
3204 responsibility for 28 days or more.

3205 9.200. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,
3206 uncle or aunt.

3207 9.201. The Law requires that the carers and parents must notify the Children's Services Department of any
3208 private fostering arrangement.

3209 9.202. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is
3210 being privately fostered they will inform the Children's Services Department and inform both the parents
3211 and carers that they have done so.

3212 **Child and the Court System**

3213 9.203. As an organisation we recognise that children/young people are sometimes required to give evidence in
3214 criminal courts, either for crimes committed against them or for crimes, they have witnessed. We know

3215 that this can be a stressful experience and therefore services across the organisation will aim to support
3216 children through this process.

3217 9.204. Along with information, advice and guidance, services will use age-appropriate materials published by
3218 HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it means
3219 to be a witness, how to give evidence and the special measures which are in place to assist such as using
3220 a live link/aids to communicate and video links.

3221 9.205. We recognise that making child arrangements via the family courts following separation can be stressful
3222 and entrench conflict in families. This can be very stressful for children. Services will support
3223 children/young people going through this process.

3224 9.206. Alongside information, advice and guidance services will use online materials published by The Ministry
3225 of Justice (2018) which offers children/young people information & advice on the dispute resolution

3226 service - [Get help with child arrangements](#). These materials will also be offered to parents and carers if
3227 appropriate.

3228 9.207. Ensure that children/young people are sufficiently supported where a parent has been sent to prison;
3229 adequate support includes protection from stigma, isolation and poor mental health.

3230 **Fabricated or induced illnesses (FII)**

3231 9.208. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually
3232 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3233 9.209. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's
3234 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3235 9.210. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This
3236 ranges from extreme neglect (failing to seek medical care) to induced illness.

3237 9.211. Behaviours in FII include a parent/carers who:

- 3238 • persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3239 • exaggerates or lies about their child's symptoms,
- 3240 • manipulates test results to suggest the presence of illness – for example, by putting glucose in urine
3241 samples to suggest the child has diabetes,
- 3242 • deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary
3243 medication or other substances.

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