

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

Whinfell School

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Contents

1. Monitoring and review	2
2. Terminology	3
3. Definitions and age-related arrangements	4
Multi agency working – Safeguarding Partners & Children’s Social Care	5
Child protection definition	5
Safeguarding definition – Working together to safeguarding children 2018	5
Safeguarding definition – Keeping Children Safe in Education 2022	5
Safeguarding Adults	6
The difference between safeguarding and child protection	6
Abuse and neglect – child and young person context	6
4. Purpose	7
5. Policy	7
Safeguarding culture of the organisation	7
Divisional Safeguarding Board	8
What staff should read and be aware of	9
Whole service approach to Safeguarding	10
Children with special educational needs and disabilities or physical health issues	10
Virtual school heads	10
6. Procedure	11
Roles and responsibilities	11
Information sharing and managing the child protection file	13
LADO referral criteria (KCSIE2022) – meeting the harm threshold	14
Children potentially at greater risk of harm	14
Unexplained body marks	15
A disclosure from an Individual	15
Risk Assessment	17
Following a report - what to consider	17
Options to manage the report	18
Unsubstantiated, unfounded, false or malicious reports	19
Safeguarding and supporting the victim	19
Safeguarding and supporting the alleged perpetrator(s)	20
Setting priorities	20
Allegation of abuse by one or more Individuals on another Individual	21
Allegation of abuse of an Individual who is not registered at our provision – staff involved	21
Allegation of abuse of an Individual who is not registered at our provision- third party involved	21

43	Allegations against staff	22
44	Allegations against staff in Education	22
45	Allegations against supply teachers and all workers supplied by agency	23
46	Allegations against the DSL (Principal or Registered Manager or DSL as a substantive role)	23
47	Allegations against the Managing Director	24
48	Allegations against any other Senior Leader	24
49	Allegations against the Executive Head of Children's Services	25
50	Allegations against the Chief Executive Officer	25
51	Allegations - The initial response	25
52	No Further Action	27
53	Further enquiries	27
54	Suspension	27
55	Supporting those involved	27
56	Allegation outcomes	28
57	Serious incident reporting	29
58	Death of someone in our care including rapid response to unexpected death	29
59	Abuse of position of trust	29
60	Volunteers	30
61	Contractors	30
62	Use of school or college premises for non-school/college activities	30
63	Extended school and off-site arrangements	30
64	Use of mobile phones	30
65	Photography and images	31
66	Physical intervention and use of reasonable force	31
67	Staff Taking Medication or other substances	31
68	Information for individuals and relatives/carers	31
69	Recruitment and vetting	31
70	Requirements to inform Disclosure and Barring Services (DBS)	32
71	Record keeping	32
72	Monitoring	33
73	Training	33
74	Confidentiality and information sharing	33
75	Complaints and Monitoring	36
76	7. Accountability	36
77	8. Further Safeguarding information – what everyone needs to know (Appendix 12)	36
78	9. Appendices	37
79	Appendix 1: Relevant policies and documents	37
80	Appendix 2: Legislation and guidance	38
81	Appendix 3: Child Protection and safeguarding procedure (Flow chart)	40
82	Appendix 4: Types of abuse – children	41
83	Appendix 5: Types of abuse - adults	42
84	Appendix 6: Signs that someone could be a victim	44
85	Appendix 7: Signs that someone could be an abuser	46
86	Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting and recording procedure	47
88	Appendix 9: Key contacts	50
89	Appendix 10. Safeguarding in children's Services - illustration	52
90	Appendix 11. Low – level concerns (Education)	53
91	Appendix 12. Further Safeguarding information – what everyone needs to know	55

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



Paddy Sandham
Principal
August 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 Whinell School we have 16 young people attending and/or residing between the ages of 11-19.
Head of Service	This is the senior person with overall responsibility for the School. At Whinell this is the Principal who is Paddy Sandham for the school and the Registered Manager Jenny Carradus for the Children's home.
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	Means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	This means the worker allocated to the individual’s family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Safeguarding Authority	Children’s Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] - England, Regional Safeguarding Children’s Boards [RSCB] – Wales *whichever apply for the type of service and country
LADO	Local Authority Designated Officer
DSL/DSL Deputy	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
CambianKPI	The online in-house information system, which holds data for each site on quality measures.

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

235 4.3. Policies and procedures for child protection and safeguarding must be undertaken in accordance with
236 the requirements of the local authority in which the establishment is situated.

237 4.4. This policy, and supporting information in various accessible forms, is made available to all individuals,
238 staff and parents associated with Cambian Whinfell School to ensure that everyone is clear on procedures
239 for ensuring the protection of children and safeguarding children and young adults.

240 4.5. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11.**
241 **Staff Code of Practice and GHR 37. Code of Conduct.**

242 4.6. In addition, staff should be aware of and have access to the **NSPCC whistle-blowing helpline number**
243 **0800 028 0285** and the Cambian Whistleblowing service operated by **EthicsPoint on 0800 086 9128**. More
244 information about EthicsPoint and how it can be contacted can be found in the Whistleblowing policy.

245 4.7. [‘When to call the police’](#) has been produced by the National Police Chiefs Council (NPCC) to support
246 school and college staff with when it is appropriate to contact the police.

247 4.8. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer
248 from harm, it is important that a referral to children’s social care (and if appropriate the police) is made
249 immediately. Referrals should follow the local referral process.

250 **5. Policy**

251 Safeguarding culture of the organisation

252 5.1. Cambian safeguarding culture can be best described as:

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

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

292 Divisional Safeguarding Board

- 293 5.10. As an organisation Caretech children's services operates three Divisional Safeguarding Boards: Education,
294 Residential Care and Fostering. The main purpose of each board is to ensure that all services across
295 all divisions discharge their responsibilities effectively for assuring safe and secure services for children
296 and young people, and manage all safeguarding risks appropriately within its own workforce, including

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

299 What staff should read and be aware of

300 5.11. On the 1st September 2023 Keeping Children Safe in Education (2023) guidance replaced Keeping Children
301 Safe in Education 2022. It is essential that everybody working in a school or college understands their
302 safeguarding responsibilities. Staff who work directly with children read at least [Part one](#) of this guidance.
303 Governance Boards and proprietor (or those acting on their behalf) working with their senior leadership
304 teams and especially their designated safeguarding lead, should ensure that those staff who do not work
305 directly with children read either Part one or [Annex A](#) (a condensed version of Part one) of this guidance.

306 5.12. The guidance should be read alongside:

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

310 5.13. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how
311 the learning from KCSIE2023 will take place with their staff. School /college's SLT should ensure that staff
312 complete the KCSIE2023 knowledge check.

313 5.14. All staff should be aware of systems within their school or college, which support safeguarding, and these
314 should be explained to them as part of staff induction. This should include the:

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

325 5.15. All staff should be aware of the process for making referrals to children's social care and for statutory
326 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child
327 suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might
328 be expected to play in such assessments.

329 5.16. Schools concerned about a child's/young person's welfare should refer their concern to local authority
330 children's social care where the school is located. If the child is placed at the school by a different LA then
331 the school will need to inform that LA as well. Where a child is suffering, or is likely to suffer from harm,
332 it is important that a referral to children's social care (and if appropriate the police) is made immediately.
333 Referrals should follow the local referral process. Children's homes/care homes should follow their
334 referral process as per their local procedure and contact Safeguarding Partner/Safeguarding Board as per
335 their local Safeguarding procedure.

336 5.17. All staff should know what to do if a child/young person/young adult tells them he/she is being abused,
337 exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate
338 level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a
339 deputy) and children's social care. Staff should never promise a child that they would not tell anyone
340 about a report of any form of abuse, as this might ultimately not be in the best interests of the child.

341 5.18. All staff should be able to reassure victims that they are being taken seriously and that they will be
342 supported and kept safe. A victim should never be given the impression that they are creating a problem

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

345 5.19. It is important to explain that the law is in place to protect children and young people rather than
346 criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

347 5.20. All staff should be aware that children may not feel ready or know how to tell someone that they are
348 being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For
349 example, children may feel embarrassed, humiliated, or being threatened. This could be due to their
350 vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from
351 having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also
352 important that staff determine how best to build trusted relationships with children and young people
353 which facilitate communication.

354 5.21. Staff should **not** assume a colleague, or another professional will act and share information that might be
355 critical in keeping children safe. They should be mindful that early information sharing is vital for the
356 effective identification, assessment, and allocation of appropriate service provision, whether this is when
357 problems first emerge, or where a child is already known to local authority children's social care (such as
358 a child in need or a child with a protection plan).

359 Whole service approach to safeguarding

360 5.22. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or
361 college approach to safeguarding. This means ensuring safeguarding and child protection are at the
362 forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems,
363 processes and policies should operate with the best interests of the child at their heart.

364 5.23. Where there is a safeguarding concern, the child's wishes and feelings must be considered when
365 determining what action to take and what services to provide. Systems should be in place, and they
366 should be well promoted, easily understood and easily accessible for children to confidently report abuse,
367 knowing their concerns will be treated seriously, and knowing they can safely express their views and
368 give feedback.

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

370 5.24. Children with special educational needs or disabilities (SEND) or certain health conditions can face
371 additional safeguarding challenges. There might be some additional barriers when recognising abuse and
372 neglect in this group of children. These can include:

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

381 5.25. SEN division and other services where children have/may have SEND should consider extra pastoral
382 support and attention for these children, along with ensuring any appropriate support for communication
383 is in place. Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and](#)
384 [Supporting Pupils at School with Medical Conditions](#).

385 Virtual school heads

386 5.26. Virtual school heads manage pupil premium plus for looked after children. In maintained schools and
387 academies, the designated teacher should work with the virtual school head to discuss how funding can
388 be best used to support the progress of looked after children in the school and meet the needs identified
389 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: Jennifer Carradus

Contact: 07468483492

- 6.4. **Our DSL** is the Registered Manager 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 Jennifer Carradus is
461 unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team

lead by a DSL with a number of deputies where required. Our Designated Deputies are Paddy Sandham and Emma Brown.

		
Name: Jennifer Carradus	Name: Paddy Sandham	Name: Emma Brown
Contact: 07468483492	Contact: 07860752376	Contact: 07544129504

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

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

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

Information sharing and managing the child protection file

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

6.11. Records should include:

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

6.12. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in [KCSIE 2023](#) and [Information sharing advice for safeguarding practitioners](#). Schools and colleges using Behaviour Watch must set up their system group purposes in line with Behaviour Watch guidance. Behaviour Watch 'Safeguarding Group' controls who can view and report on Concern/SG slips and 'Not Safeguarding Group' to restrict who can complete certain sections within the Concern/SG slips.

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

495 college additional options to contact a responsible adult when a child missing education is also identified
496 as a welfare and/or safeguarding concern.

497 **LADO referral criteria (KCSIE2023) – meeting the harm threshold**

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

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

509 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of the](#)
510 [Children Act 1989 as amended by the Adoption and Children Act 2002](#).

511 6.16. The last bullet point above includes behaviour that may have happened outside of school or college that
512 might make an individual unsuitable to work with children; this is known as transferable risk. Where
513 appropriate an assessment of transferable risk to children with whom the person works should be
514 undertaken. If in doubt, seek advice from the local authority designated officer (LADO).

515 6.17. This above information relates to members of staff, supply staff and volunteers who are currently working
516 in any school or college regardless of whether the school or college is where the alleged abuse took place.
517 Allegations against a teacher who is no longer teaching should be referred to the police. Historical
518 allegations of abuse should also be referred to the police.

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

520 6.18. Many children and young people in our services (education and care) have an allocated social worker due
521 to safeguarding or welfare needs.

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

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

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

535 6.22. Children missing from education, particularly persistently, can act as a vital warning sign to a range of
536 safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county
537 lines. It is important the school or college's response to children missing from education supports

538 identifying such abuse and helps prevent the risk of them going missing in the future. More information
539 can be found in [para 175 of KCSIE 2023](#)

540 **Unexplained body marks**

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

548 6.24. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the
549 correct course of action for dealing with unexplained body marks.

550 6.25. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no
551 reasonable explanation can be given the DSL must contact the local Safeguarding Authority for further
552 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

553 6.26. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be
554 opened and safeguarding process followed.

555 6.27. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome
556 must be shared with social worker and parents.

557 **Disclosure from an Individual**

558 6.28. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
559 **procedure.**

560 6.29. It is important to note that children/young people may not find it easy to tell staff about their abuse
561 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react
562 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a
563 member of school or college staff may overhear a conversation that suggests a child has been harmed or
564 a child's/young person's own behaviour might indicate that something is wrong. If staff have any
565 concerns about a child's/young person's welfare, they should act on them immediately rather than wait
566 to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**
567 **procedure.**

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

572 6.31. The service's initial response to a report from a child is incredibly important. How the staff respond to a
573 report can encourage or undermine the confidence of future victims of sexual violence and sexual
574 harassment to report or come forward.

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

581 6.33. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and how
582 the report will be progressed, don't ask leading questions and only prompt the child where necessary

- 583 with open questions – where, when, what, etc. It is important to note that whilst leading questions should
584 be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- 585 6.34. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or
586 college staff. It is important that the person to whom the child discloses recognises that the child has
587 placed them in a position of trust. They should be supportive and respectful of the child.
- 588 6.35. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the report
589 and immediately write up a thorough summary. This allows the staff member to devote their full
590 attention to the child and to listen to what they are saying. It may be appropriate to make notes during
591 the report (especially if a second member of staff is present). However, if making notes, staff should be
592 conscious of the need to remain engaged with the child and not appear distracted by the note taking.
593 Either way, it is essential a written record is made using Concern form which is part of this policy. The
594 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report
595 to the DSL must be completed within an hour from the moment of the disclosure being made.
- 596 6.36. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of
597 the note taker. Staff should be aware that notes of such reports could become part of a statutory
598 assessment by Safeguarding Authority and/or part of a criminal investigation.
- 599 6.37. In cases where either a child/young person informs the staff that an act of FGM – however described –
600 has been carried out on her, or where the staff observes physical signs on a girl appearing to show that
601 an act of FGM has been carried out these situations, the police must be informed. The DSL should also be
602 informed who will trigger child protection/safeguarding procedures described in this policy. If a
603 child/young person is at immediate risk – the Police (999) must be contacted immediately. If a
604 child/young person required medical attention, follow steps identified in ‘**Setting priorities**’ section
605 below.
- 606 6.38. Remember, **do not**:
- 607 • Investigate the incident
 - 608 • Ask leading questions
 - 609 • Get the young person to repeat the disclosure over and over
 - 610 • Make assumptions or offer alternative explanations
 - 611 • Approach/inform the alleged abuser
- 612 6.39. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**
613 **and recording procedure.**
- 614 6.40. All staff know that they can contact the Local Authority direct should that be necessary. Where a
615 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding
616 Adult Board. Where someone is over 18 but still receiving children’s services, the matter should be dealt
617 with by the local Safeguarding Adult Board.
- 618 6.41. For allegation made against a staff member or senior managers/directors follow relevant allegations
619 procedures described later on in this policy.
- 620 6.42. Where contact is made with the Local Authority in which Cambian Whinfell School is geographically
621 located, contact will also be made with the individual’s own Local Authority and also the child/young

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

624 6.43. In the case of serious harm, and/or the individual is in immediate danger the local police should be
625 informed immediately and they can take immediate protective action as necessary.

626 6.44. If a member of staff feels their concerns are not being taken seriously then they are to inform a more
627 senior manager, a Director of the Company or contact Ofsted/CQC/CIW/Estyn, the local safeguarding
628 boards, the police or the **Whistleblowing Hotline – on 0800 086 9128.**

629 Risk Assessment

630 6.45. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk
631 and needs assessment. Where there has been a report of sexual harassment, the need for a risk
632 assessment should be considered on a case-by-case basis. The risk and needs assessment should
633 consider:

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

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

650 Following a report - what to consider

651 6.47. Important considerations will include:

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

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

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

- the ages of the children involved;

- the developmental stages of the children involved;

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

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

- that sexual violence and sexual harassment can take place within intimate personal relationships between children/young people/adults;

- importance of understanding intra familial harms and any necessary support for siblings following incidents

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

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

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

Options to manage the report

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

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

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

- Early help:** In line with the above, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early

701 help means providing support as soon as a problem emerges, at any point in a child's life.
702 Providing early help is more effective in promoting the welfare of children than reacting
703 later. Early help can be particularly useful to address non-violent harmful sexual behaviour
704 and may prevent escalation of sexual violence. It is particularly important that the DSL (and
705 their deputies) know what the Early Help process is and how and where to access support.

706 • Schools and colleges, as relevant agencies, should be part of discussions with statutory
707 safeguarding partners to agree the levels for the different types of assessment and services
708 to be commissioned and delivered, as part of the local arrangements. Safeguarding
709 partners should publish a local threshold document which includes the process for the local
710 early help assessment and the type and level of early help services to be provided, and DSLs
711 (and their deputies) will need to familiarise themselves with this document.

712 • **Referrals to Safeguarding Authority** - where a child has been harmed, is at risk of harm,
713 or is in immediate danger, schools and colleges should make a referral to the local
714 Safeguarding Authority. At the point of referral, schools and colleges will generally inform
715 parents or carers, unless there are compelling reasons not to (if informing a parent or
716 carer is going to put the child at additional risk). Any such decision should be made with
717 the support of children's social care.

718 • **Reporting to the Police** - any report to the police will generally be in parallel with a referral
719 to children's social care (as above. It is important that the DSL and their deputies) are clear
720 about the local process for referrals and follow that process.

70 Unsubstantiated, unfounded, false or malicious reports

722 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider
723 whether the child and/or the person who has made the allegation needs help or may have been abused
724 by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding authority may
725 be appropriate.

726 6.52. If a report is shown to be deliberately invented or malicious, the school or college should consider
727 whether any disciplinary action is appropriate against the individual who made it as per their own
728 behaviour policy.

70 Safeguarding and supporting the victim

730 6.53. The needs and wishes of the victim should be paramount (along with protecting the child)/young person
731 in any response. It is important they feel in as much control of the process as is reasonably possible.
732 Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall,
733 the priority should be to make the victim's daily experience as normal as possible, so that the school or
734 college is a safe space for them.

735 6.54. Consider the age and the developmental stage of the victim, the nature of the allegations and the
736 potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual
737 violence and sexual harassment, a power imbalance is likely to have been created between the victim
738 and alleged perpetrator(s).

739 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel
740 ashamed for making a report. This has been made clear throughout this policy and procedure.

741 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The
742 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different
743 from that for a report of rape.

744 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,
745 mental, and sexual health problems and unwanted pregnancy. Children and young people that have a
746 health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault
747 Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors

748 of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children
749 and adults, regardless of when the incident occurred.

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

755 Safeguarding and supporting the alleged perpetrator(s)

756 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice:
757 [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles
758 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding
759 and supporting the alleged perpetrator(s):

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

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

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

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

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

782 Setting priorities

783 6.60. The priority, at all stages throughout the child protection or safeguarding process, is the interests and
784 safety of the individual.

785 6.61. Where appropriate, any concerns will be discussed with the individual's family / carers and where
786 possible their agreement will be sought to making a referral to the Local Authority. However, where
787 there is a conflict of interests between the Individual and parent/guardian, the interests of the individual
788 must take priority and Cambian Whinell School the right to contact the individual's local authority, social
789 care or the police, without notifying parents/carers if this is in their best interests.

790 6.62. If an urgent medical, attention or advice is required and GP/specialist doctor is not available, staff MUST
791 use the NHS 111 service. NHS 111 is available 24 hours a day, 7 days a week.

792 6.63. If the situation is life-threatening, staff must call 999 immediately and ask for an ambulance. Alternatively,
793 if it is assessed to be in the best interest of the child/young person - the DSL MUST take the Individual to
794 the Accident and Emergency Unit at the nearest hospital, having first notified the Local Authority/Police,

795 remembering that every reasonable effort should be made to inform the parents/carers as soon as
796 possible.

797 6.64. If the suspected abuse is sexual, then the medical professional must determine if the medical examination
798 should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility
799 that the needs of the young person are such that medical attention is the priority, in such case medical
800 professional's judgment must be followed. There must at all times be an appropriate adult (parent,
801 guardian or a social worker) with the individual whether from the individual's care home/school/college,
802 the Local Authority or the Police, if the parents/carers are not included. This section must be read in
803 conjunction with our **0.29. Child Sexual Exploitation policy**.

804 6.65. Cambian will provide an advocate to each individual where appropriate, if they are unable to speak for
805 themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to the Mental
806 Capacity Act. Further information on MCA are available in our **0.13. Mental Capacity and Consent policy**.

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

808 6.66. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for
809 dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual
810 is suffering or likely to suffer significant harm'. DSL must refer individual-on-individual abuse including
811 child on child/young adult on young adult or between individuals of a different age or other to a
812 Safeguarding Authority, local authority and regulator.

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

814 6.67. If we were given information that suggested that someone who does not reside at or attends our location
815 has been abused by one of our members of staff, the DSL would immediately report this to the Local
816 Authority and LADO. The Head of Service must be kept informed and HR Business Partner consulted.
817 Should the staff member be involved we would then formally advise the member of staff of the allegation,
818 making it clear that we would not play any part in the investigatory process. The employee would be
819 advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived
820 risks) etc., in exactly the same way as if the allegation had involved an Individual at our
821 home/school/college. However, the HR Business Partner must be consulted before any action is taken. If
822 the allegation were subsequently proved to be unfounded, he or she would be given full support in
823 resuming their career. Should we be asked by LADO/Safeguarding authority to be involved in any
824 potential investigations or parts of it, an HR Business Partner will have to be consulted first. At this point,
825 an assessment will need to be made to identify what detail (if any) can be disclosed to a member of staff
826 involved.

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

828 6.68. If we were given information that suggested that someone who does not reside at or attends our location
829 has been abused by a third party (known or unknown to the provision), the DSL would immediately report
830 this to the Local Authority and Police. The Head of Service must be kept informed. DSL will follow advice

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

833 Allegations against staff

834 6.69. All allegations must be reported to the DSL Jennifer Carradus or in their absence to a DSL Deputy – see
835 your local Safeguarding poster. In addition, where appropriate - HR Business Partner must be consulted.

836 6.70. When an allegation is made against a member of staff, set procedures must be followed, see the flow
837 chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.

838 6.71. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully assessed
839 and investigated. Staff who are the subject of an allegation have the right to have their case dealt with
840 fairly, quickly and consistently and to be kept informed of its progress.

841 6.72. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided
842 for what to do in the event an allegation is made against them.

843 Allegations against staff in Education

844 6.73. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors.
845 The allegations are split into two groups:

846 • Allegations that may meet the harm threshold (see **LADO referral criteria**) – **meeting the**
847 **harm threshold** of this policy)

848 • Allegation/concerns that do not meet the harms threshold – referred in the guidance and
849 this policy as ‘low - level concerns’ - **Appendix 11. Low – level concerns (Education)**.

850 6.74. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they
851 continue to work in regular or close contact with children in their present position, or in any capacity with
852 children in a school or college.

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

863 6.76. Where an adult makes an allegation to a school or college that they were abused as a child, the individual
864 should be advised to report the allegation to the police. Non-recent allegations made by a child, should
865 be reported to the LADO in line with the local authority’s procedures for dealing with non-recent
866 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no
867 matter how long ago it happened.

868 6.77. Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher
869 because of serious misconduct, or might have dismissed them or ceased to use their services had they
870 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching
871 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found
872 on GOV.UK.

873 6.78. Schools and colleges using Behaviour Watch must ensure that concerns/allegations related to staff [‘staff’
874 slip], are set up to be only visible to the selected group of people e.g. Head teacher/Principal or the DSL
875 or both depending on the schools/colleges internal arrangement. The same approach must be applied to
876 Real Time Notifications. As the schools’/colleges’ arrangements around who will receive staff related

877 concerns will vary between the schools/colleges, it is up to schools to ensure their arrangements are
878 considered when setting up the Concern/SG: *Staff* function.
879

8 Allegations against supply teachers and all workers supplied by agency

881 6.79. In some circumstances schools and colleges will have to consider an allegation against an individual not
882 directly employed by them, where its disciplinary procedures do not fully apply because agencies will
883 have their own policies and procedures; for example, supply teachers or contracted staff provided by an
884 employment agency or business.

885 6.80. Whilst the organisation's schools and colleges are not the employer of supply teachers, they should
886 ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease
887 to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the
888 LADO to determine a suitable outcome. Schools and colleges must also consult the HR Business Partner
889 who may advise further. Governance boards and proprietors should discuss with the supply agency or
890 agencies where the supply teacher is working across a number of schools or colleges, whether it is
891 appropriate to suspend the supply teacher, or redeploy them to another part of the school or college,
892 whilst they carry out their investigation.

893 6.81. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or
894 children's social care. The school or college will usually take the lead because agencies do not have direct
895 access to children or other school or college staff, so they will not be able to collect the facts when an
896 allegation is made, nor do they have all the relevant information required by the LADO as part of the
897 referral process.

898 6.82. When using a supply agency, schools and colleges should inform the agency of its process for managing
899 allegations but also take account of the agency's policies and investigatory process and their duty to refer
900 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or
901 equivalent to meetings and keeping them up to date with information about its policies. It is important
902 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be
903 consulted.
904

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

906 6.83. All allegations must be reported to:

907 - Education division: Regional Education Lead Naseem Akhtar, unless within residential
908 education the Registered Manager is the DSL in which case the matter will be referred to
909 the Head/ Principal. For the DSL fulfilling the role as their substantive role, all allegations
910 must be reported to the Principal/Head.

911 - Children's residential care division: Regional Manager Vikki Keenan, unless Regional
912 Manager is the DSL in which case the matter will be referred to the Managing Director.

913 6.84. Depending on the division and who is the service DSL, people notified of allegation made (see above) will
914 then refer the matter to IWestmorland and Furness Safeguarding Authority/LADO and notify their line
915 manager:

916 - Education division: Regional Education Lead Naseem Akhtar or

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

919 - Children's residential care division: Managing Director Graham Norris.

920 6.85. The person who referred the matter to Westmorland and Furness Safeguarding Authority/LADO in line
921 with agreed course of action will decide about who will lead the case including management investigation

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

924 6.86. In residential education associated with children's homes/care homes the Responsible/Nominated
925 Individual MUST also be notified.

926 6.87. Services using Behaviour Watch system – allegations made against the DSL or DSL Deputy who have full
927 access to the system including Concern/Safeguarding function, should not be initially entered to the
928 system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as they would
929 have been prior to implementation of the Behaviour Watch. This is to ensure that no one, including those
930 who are part of the service's Safeguarding Team are able to see the details of their own case which could
931 have a detrimental impact on the investigation itself and the outcome of it. However, once the case has
932 been concluded, a decision should then be made about whether or not the detail related to the case
933 should be retrospectively entered in to Behaviour Watch or kept in the original format. Such a decision
934 should be made by the Case Manager, Managing Director and a member of HR Team. Should a decision
935 be made to keep it in the original format, a Concern/SG slip in the Behaviour Watch must still be
936 retrospectively opened and a note added to reflect that there was an allegation made against the DSL/DSL
937 Deputy but without specifying any further detail about the character of the allegation. Instead, a
938 reference number of the case and location of the pack related to the case is provided. This action will
939 ensure that the case has been captured in the system, which will then allow the service to generate a log
940 with accurate numbers of concerns and safeguarding cases for the service.

9 Allegations against the Regional Manager/other Regional staff

942 6.88. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
943 Head/Principal) who will make the initial referral to Westmorland and Furness Safeguarding
944 Authority/LADO. Following this, the allegation should be passed to the identified senior person to follow
945 through with Westmorland and Furness Safeguarding Authority/LADO and subsequently act in line with
946 agreed course of action. This means that the DSL will retain the responsibility to report the initial concern,
947 but will have no further part in the process regarding gathering any information or, should it be required,
948 in the actual investigation in relation to a senior member.

949 6.89. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to
950 Westmorland and Furness Safeguarding Authority/LADO and act in line with agreed course of action.

951 6.90. The appropriate HR Business Partner should be notified, so they can advise and where required - support
952 the investigation.

9 Allegations against the Operations Directors or Managing Director

954 6.91. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
955 Head/Principal) who will make the initial referral to Westmorland and Furness Safeguarding
956 Authority/LADO. Following this, the allegation should be passed to the identified senior person to follow
957 through with Westmorland and Furness Safeguarding Authority/LADO and subsequently act in line with
958 agreed course of action. This means that the DSL will retain the responsibility to report the initial concern,
959 but will have no further part in the process regarding gathering any information or, should it be required,
960 in the actual investigation in relation to a senior member.

961 6.92. Allegations not linked to specific site must be reported to Managing Director for Education who will refer
962 the matter to Westmorland and Furness Safeguarding Authority/LADO and act in line with agreed course
963 of action.

964 6.93. The Head of HR should be notified, so they can advise and where required - support the investigation.

9 Allegations against any other Senior Leader

966 6.94. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
967 Head/Principal) who will make the initial referral to Westmorland and Furness Safeguarding
968 Authority/LADO Following this, the allegation should be passed to the identified senior person to follow
969 through with Westmorland and Furness Safeguarding Authority/LADO and subsequently act in line with
970 agreed course of action. This means that the DSL will retain the responsibility to report the initial concern,

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

973 6.95. Allegations not linked to specific site must be reported to the person's (whom allegation is made against)
974 line manager who will refer the matter to Westmorland and Furness Safeguarding Authority/LADO and
975 act in line with agreed course of action.

976 6.96. The Head of HR should be notified, so they can advise and where required - support the investigation.

9 Allegations against the Executive Head of Children's Services

978 6.97. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
979 Head/Principal) who will make the initial referral to Westmorland and Furness Safeguarding
980 Authority/LADO. Following this, the allegation should be passed to the identified senior person to follow
981 through with Westmorland and Furness Safeguarding Authority/LADO and subsequently act in line with
982 agreed course of action. This means that the DSL will retain the responsibility to report the initial concern,
983 but will have no further part in the process regarding gathering any information or, should it be required,
984 in the actual investigation in relation to a senior member.

985 6.98. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
986 Amanda Sherlock who will refer the matter to Westmorland and Furness Safeguarding Authority/LADO
987 and act in line with agreed course of action.

988 6.99. The Head of HR should be notified, so they can advise and where required - support the investigation.

9 Allegations against the Chief Executive Officer

990 6.100. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
991 Head/Principal) who will make the initial referral to Westmorland and Furness Safeguarding
992 Authority/LADO Following this, the allegation should be passed to the identified senior person to follow
993 through with Westmorland and Furness Safeguarding Authority/LADO and subsequently act in line with
994 agreed course of action. This means that the DSL will retain the responsibility to report the initial concern,
995 but will have no further part in the process regarding gathering any information or, should it be required,
996 in the actual investigation in relation to a senior member.

997 6.101. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
998 Amanda Sherlock who will refer the matter to Westmorland and Furness Safeguarding Authority/LADO
999 and act in line with agreed course of action.

1000 6.102. The Head of HR should be notified, so they can advise and where required - support the investigation.

10 Allegations - The initial response

1002 6.103. Where the school or college identifies a child/young person has been harmed, that there may be an
1003 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact

1004 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are
1005 two aspects to consider when an allegation is made:

1006 • **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is
1007 not at risk and referring cases of suspected abuse to the local authority children's social
1008 care as described in Part one of this guidance.

1009 • **Investigating and supporting the person subject to the allegation** - the case manager
1010 should discuss with the LADO, the nature, content and context of the allegation, and agree
1011 a course of action.

1012 6.104. When dealing with allegations, schools and colleges should:

- 1013 • apply common sense and judgement
- 1014 • deal with allegations quickly, fairly and consistently; and
- 1015 • provide effective protection for the child and support the person subject to the allegation.

1016 6.105. Schools and colleges should ensure they understand the local authority arrangements for managing
1017 allegations, including the contact details and what information the LADO will require when an allegation
1018 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with
1019 local procedures to establish the facts to help them determine whether there is any foundation to the
1020 allegation, being careful not to jeopardise any future police investigation. For example:

- 1021 • **was the individual in the school or college at the time of the allegations?**
- 1022 • **did the individual, or could they have, come into contact with the child?**
- 1023 • **are there any witnesses? and,**
- 1024 • **was there any CCTV footage?**

1025 6.106. These are just a sample of example questions. Services should be familiar with what initial information
1026 the LADO will require. This information can be found in local policy and procedural guidance provided by
1027 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared
1028 with the HR department to support any investigation.

1029 6.107. When to inform the individual of the allegation should be considered carefully on a case-by-case basis,
1030 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1031 6.108. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion
1032 involving the police and/or children's social care will be convened in accordance with the statutory
1033 guidance [Working Together to Safeguard Children](#).

1034 6.109. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the
1035 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps
1036 with the case manager (A 'case manager' will be the person leading any investigation. In most cases this
1037 will be a senior leader from outside the school/home). The LADO should be informed who will lead the

1038 investigation to ensure there is no conflict of interest or any other concerns related to the choice of the
1039 case manager.

1040 **No Further Action**

1041 6.110. Where the initial discussion leads to no further action, the case manager and the LADO
1042 should:

- 1043 • record the decision and justification for it; and,
- 1044 • agree on what information should be put in writing to the individual concerned and by
1045 whom.

1046 **Further enquiries**

1047 6.111. Where further enquiries are required to enable a decision about how to proceed, the LADO and case
1048 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases,
1049 the investigation should normally be undertaken by a senior member of the school's or college's staff.

1050 6.112. Where there is a lack of appropriate resource within the school or college, or the nature or complexity
1051 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional
1052 Lead (Education or Care), a Director, HR Business Partner or an independent investigator if appropriate.

1053 6.113. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as
1054 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals,
1055 depending on the complexity of the case.

1056 6.114. Wherever possible, the first review should take place no later than four weeks after the initial
1057 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review
1058 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges
1059 when considering allegations against adults working with children. The LADO's role is not to investigate
1060 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police,
1061 children's social care, the school or college, or a combination of these.

1062 **Suspension**

1063 6.115. Suspension should not be an automatic response when an allegation is reported. All options to avoid
1064 suspension should be considered prior to taking that step. The case manager must consider carefully
1065 whether the circumstances warrant suspension from contact with children at the school or college, or
1066 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a
1067 child or other children at the school or college is/are at risk of harm, or the allegation could be considered
1068 as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR
1069 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have been
1070 involved. More information on suspension and associated process can be found in [KCSIE 2023 Part 4 -
1071 Suspension](#).

1072 **Supporting those involved**

1073 6.116. The welfare of a child/young person is paramount) and this will be the prime concern in terms of
1074 investigating an allegation against a person in a position of trust. However, when an allegation or
1075 safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject
1076 of the investigation, and potentially for the family members. It is important that an employer offers
1077 appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is
1078 confidential and should not ordinarily be shared with the other staff or with children or parents who are

1079 not directly involved in the investigation. More about employer's duty of care to their employees can be
1080 found in the KCSIE2023 guidance.

1081 6.117. Staff whom allegation/s have been made against must always be supported and if suspended they will
1082 receive a support person (nominated contact), any suspension is not an indication of guilt.

1083 **Allegation outcomes**

1084 6.118. The definitions that should be used when schools and colleges determine the outcome of an allegation
1085 are set out below:

- 1086 • Substantiated: there is sufficient evidence to prove the allegation;
- 1087 • Malicious: there is sufficient evidence to disprove the allegation and there has been a
1088 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1089 • False: there is sufficient evidence to disprove the allegation;
- 1090 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.
1091 The term, therefore, does not imply guilt or innocence; or
- 1092 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the
1093 allegation being made.

1094 6.119. It should be noted that these definitions are available to support the decision-making process. However,
1095 in certain cases, in the absence of any substantiating evidence, the Company may still progress through

1096 the formal disciplinary procedure if there are reasonable grounds to do so, or there is a reasonable belief
1097 that an employee has committed an act of misconduct.

1098 6.120. Ultimately, the options open to the school or college depend on the nature and circumstances of the
1099 allegations and the evidence and information available. This will range from taking no further action, to
1100 dismissal or a decision not to use the person's services in future.

1101 **Serious incident reporting**

1102 6.121. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported
1103 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

1104 **Death of someone in our care including rapid response to unexpected death**

1105 6.122. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
1106 rapid response, process described below:

- 1107 • Call the Ambulance and Police
- 1108 • Unless the 999 operator tells you to, do not touch the person; do not move anything
- 1109 around them, which may form part of forensic evidence. Police will decide about the
- 1110 forensic examinations and appropriate security of the scene.
- 1111 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI)
- 1112 reporting procedure. The DSL will contact the Managing Director of the division they work
- 1113 in and verbally inform them of what happened before completing SUI Part 2.
- 1114 • DSL will contact Children's/Adults Social Care Team
- 1115 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health
- 1116 Services (CAMHS) should also be notified by the Safeguarding Authority.

1117 6.123. Once the above rapid steps have been taken, further steps described below must be followed.

1118 6.124. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the
1119 following within 24 hours:

- 1120 • Group Executive Director Managing Director, Responsible/Nominated Individual, Regional
- 1121 Lead following the **35.01. Caretech Children's services SUI process.**
- 1122 • Next of kin/parents/carers of the deceased.
- 1123 • Where the death of an individual occurs in an education location the assistance of the
- 1124 local police and social services department should be sought in informing the
- 1125 parents/guardians.
- 1126 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn
- 1127 • Ministry of Justice if applicable.
- 1128 • The placing authority/authorities.
- 1129 • The local authority responsible for Social Services and Education (where the death takes
- 1130 place in a registered school) within whose area the education location is situated.
- 1131 • The District Health Authority within whose area the education location is situated.
- 1132 • The Department for Education, (where the death takes place in a registered school).
- 1133 • The Health and Safety Executive.

1134 **Abuse of position of trust**

1135 6.125. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,
1136 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the
1137 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a
1138 position of trust, even if the relationship is consensual. This means that any sexual activity between a

1139 member of the staff and a young person under 18 may be a criminal offence, even if that young person
1140 is over the age of consent.

1141 **Visitors**

1142 6.126. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.
1143 All unauthorised visitors will be challenged by staff and reported to the home
1144 manager/headteacher/principal before entry is authorised.

1145 **Volunteers**

1146 6.127. Volunteers undergo checks commensurate with their work in the home/school/college and contact with
1147 children, young people and adults i.e. if they are in regulated activity or not.

1148 **Contractors**

1149 6.128. We will check the identity of all contractors working on site and request the full range of DBS and other
1150 required checks where they work in regulated activity or unsupervised in accordance with the latest
1151 government guidance.

1152 **Use of school or college premises for non-school/college activities**

1153 6.129. Where governance boards or proprietor hire or rent out school or college facilities/premises to
1154 organisations or individuals (for example to community groups, sports associations, and service providers
1155 to run community or extra-curricular activities) they should ensure that appropriate arrangements are in
1156 place to keep children safe.

1157 **Extended school and off-site arrangements**

1158 6.130. Where extended off-site activities are provided by and managed by us, our safeguarding policy and
1159 procedures apply. If other organisations provide services or activities on our site we will check that they
1160 have appropriate policies and procedures in place, including safer recruitment procedures and clarify
1161 whose procedure is to be followed if there are concerns. There will be clear communication channels to
1162 ensure the DSL is kept appropriately informed.

1163 6.131. When our Individuals are doing off-site activities, including day and residential visits and work-related
1164 activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL
1165 will be kept appropriately informed.

1166 **Use of mobile phones**

1167 6.132. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media
1168 access including **Pro 01. Mobile Telephony Policy** at all times.

1169 6.133. All computer equipment and internet access within the home/school/college is subject to 'parental
1170 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social
1171 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons
1172 during working hours. Staff need to help our Individuals to prepare for the dangers of the internet and

1173 social media whilst promoting the many learning and social opportunities available through the internet
1174 and social media.

1175 6.134. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST
1176 neither mention Whinfell School or refer to their employment at the Whinfell School. Staff are advised
1177 not to communicate with parents, guardians, carers or Individuals via social networking sites

1178 **Photography and images**

1179 6.135. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1180 6.136. The vast majority of people who take or view photographs or videos of individuals do so for entirely
1181 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through
1182 taking or using images, so we have some safeguards in place.

1183 6.137. To protect our children, young people or young adults we will:

- 1184 • seek their consent for photographs to be taken or published (for example, on our website
1185 or in newspapers or publications)
- 1186 • seek parental consent of consent from the Individual
- 1187 • not use their full name with an image, only their initials
- 1188 • ensure that personal data is not shared
- 1189 • store images appropriately, securely and for no longer than necessary
- 1190 • only use school equipment, i.e. not personal devices
- 1191 • encourage our children, young people and adults to tell us if they are worried about any
1192 photographs that are taken of them

1193 **Physical intervention and use of reasonable force**

1194 6.138. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are
1195 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**
1196 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,
1197 recorded and monitored.

1198 **Staff taking medication or other substances**

1199 6.139. Staff members must not be under the influence of alcohol or any other substance, which may affect their
1200 ability to care for the individuals. If they are taking medication, they should seek medical advice and
1201 inform the Home Manager/Headteacher/Principal who will review the medical advice and take a decision
1202 as to whether they are fit for work.

1203 6.140. We only allow staff to work if medical advice confirms that their ability to look after individuals is unlikely
1204 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it
1205 must be securely stored and out of reach of all children, young people and young adults. This section
1206 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

1207 **Information for individuals and relatives/carers**

1208 6.141. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt
1209 with independently and that they will be kept involved in the process to the degree that they wish to be.
1210 They will be reassured that they will receive help and support in taking action.

1211 6.142. They will also be advised that they can nominate an advocate or representative to speak and act on their
1212 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could
1213 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be
1214 appointed. They will be advised of rights to legal aid in where appropriate to victim support and
1215 compensation.

1216 **Recruitment and vetting**

1217 6.143. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**
1218 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1219 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting
1220 schools should read Part 3 of KCSIE2023 guidance dedicated to Safer Recruitment.

1221 6.144. Each education location maintains a **Single Central Record (SCR)**. This covers all staff including supply
1222 teaching and teacher trainees, agency care staff as well as multisite managers and members of the
1223 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1224 6.145. For agency workers we obtain written confirmation that all checks have been completed, in line with
1225 safer recruitment from the employment business that is supplying the member of agency staff. All
1226 Locations must ensure that an agreement exists between the Location and the agency to confirm that, in
1227 the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate
1228 before that person can begin work at the home/school/college.

1229 6.146. All locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the
1230 agency.

1231 6.147. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the
1232 same recruitment regulations and procedures as the education staff.

1233 Requirements to inform Disclosure and Barring Services (DBS)

1234 6.148. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the
1235 barred lists is required.

1236 6.149. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one
1237 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to
1238 safeguarding concerns, or would have been had they not resigned.

1239 6.150. In the case of a member of teaching staff at a school or sixth form college, the case manager must
1240 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

1241 6.151. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,
1242 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she
1243 is considered unsuitable to work with children and young people.

1244 6.152. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is
1245 provided at paragraph 179.

1246 6.153. All managers must read the group leavers policy – all referrals must be recorded with HR so they can
1247 ensure any future references are correct. The references team log referrals so this can be completed. This
1248 will apply to both: DBS and TRA.

1249 Record keeping

1250 6.154. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is
1251 made, staff must keep clear and accurate records using a Concern Form.

1252 6.155. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in
1253 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns
1254 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch
1255 have Concern/Safeguarding function to record any concerns being raised. A report per child/young
1256 person can also be generated.

1257 6.156. Records should be factual, accurate, concise, ethical and relevant.

1258 6.157. All recording of written information should be legible and discussions with other professionals and
1259 agencies should be recorded chronologically.

1260 6.158. There will be a safeguarding section/folder for each Individual, which will hold any concerns/safeguarding
1261 documentation for that individual. At the front of each folder, there is an Index for Individual's Concerns.
1262 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1263 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure
1264 location.

1265 6.159. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**
1266 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information
1267 where the concern has escalated. Where this is held as a paper version this is to be made into a bound
1268 booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies
1269 only. In either case, this should be kept in a secure location.

1270 Monitoring

1271 6.160. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded,
1272 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section**
1273 **9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators
1274 (KPIs) using **CambianKPI** and the identification and management of safeguarding risks. A report on the
1275 position of every site in relation to their KPIs is produced every Wednesday.

1276 Training

1277 6.161. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction
1278 introduces the new staff member to the policy, procedure and practice at the location. They will also be
1279 orientated as to where to find information regarding safeguarding including relevant posters around the
1280 location. As part of their induction all staff are required to read this policy and confirm that, they
1281 understand their role in safeguarding and protecting young people within the service they are going to
1282 work.

1283 6.162. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must
1284 be completed as part of staff member induction and annually thereafter. This should include online
1285 safety. This is to maintain staff awareness of their responsibilities in relation to children /young
1286 people/young adult's safeguarding.

1287 6.163. Staff will not be allowed to work with individuals unless they have completed the above training. The
1288 school/college/home must check that supply/agency staff have completed basic awareness training
1289 before being allowed into contact with Individuals.

1290 6.164. Contractors and others on site who might have unsupervised access to individuals must also complete
1291 basic awareness training before being allowed to start work.

1292 6.165. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and
1293 practice throughout the year. This can be undertaken in various forums: as a face-to-face or online
1294 session, staff meetings or workshops. In addition to this, safeguarding updates including various
1295 resources are provided to schools and colleges by the external Safeguarding Network.

1296 6.166. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge
1297 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA
1298 within the boundaries they operate and be refreshed at least every two years. Both should also undertake
1299 Prevent awareness training.

1300 Confidentiality and information sharing

1301 6.167. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting
1302 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear
1303 powers to share, hold and use information for these purposes. Staff should be proactive in sharing
1304 information as early as possible to help identify, assess and respond to risks or concerns about the safety
1305 and welfare of children/ young people whether this is when problems are first emerging, or where a child
1306 is already known to local authority children's social care.

1307 6.168. Where the police are involved, wherever possible the school or college should ask the police to obtain
1308 consent from the individuals involved to share their statements and evidence for use in the employer's

1309 disciplinary process. This should be done as their investigation proceeds and will enable the police to
1310 share relevant information without delaying the conclusion of their investigation or any court case.

1311 6.169. The Safeguarding authority should adopt a similar procedure when making enquiries to determine
1312 whether the child or children named in the allegation need protection or services, so that any information
1313 obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the
1314 employer without delay.

1315 6.170. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the
1316 following:

- 1317 • who needs to know and exactly what information can be shared;
- 1318 • how to manage speculation, leaks and gossip
- 1319 • what, if any, information can be reasonably given to the wider community to reduce speculation;
1320 and
- 1321 • how to manage press interest if, and when, it should arise.

1322 6.171. Exchange or disclose of personal information with other agencies will be completed in accordance with
1323 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation including
1324 the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process
1325 personal information fairly and lawfully and to keep the information they hold safe and secure.

1326 6.172. Information relating to individual Safeguarding cases is confidential, although some information can be
1327 shared with relevant staff. This should be done only on a 'need to know' basis.

1328 6.173. Governance Boards and proprietor should ensure relevant staff have due regard to the relevant data
1329 protection principles, which allow them to share (and withhold) personal information, as provided for in
1330 the Data Protection Act 2018 and the GDPR. This includes:

- 1331 • being confident of the processing conditions which allow them to store and share
1332 information for safeguarding purposes, including information which is sensitive and
1333 personal, and should be treated as 'special category personal data'.
- 1334 • understanding that 'safeguarding of children and individuals at risk' is a processing
1335 condition that allows practitioners to share special category personal data. This includes
1336 allowing practitioners to share information without consent where there is good reason
1337 to do so, and that the sharing of information will enhance the safeguarding of a child in
1338 a timely manner but it is not possible to gain consent, it cannot be reasonably expected
1339 that a practitioner gains consent, or if to gain consent would place a child at risk.
- 1340 • for schools, not providing pupils' personal data where the serious harm test under the
1341 legislation is met. For example, in a situation where a child is in a refuge or another form
1342 of emergency accommodation, and the serious harms test is met, they must withhold

1343 providing the data in compliance with schools' obligations under the Data Protection Act
1344 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

1345 6.174. When sharing safeguarding information regarding an individual, staff will need to consider the following:

- 1346 • Information should only be shared on a 'need to know' basis when it is in the best interests
1347 of the individual
- 1348 • Informed consent should be obtained but, if this is not possible and other adults are at risk
1349 of abuse or neglect, it may be necessary to override the requirement
- 1350 • Distinguish fact from opinion
- 1351 • Ensure you are giving the right information about the right person
- 1352 • Ensure you are sharing information securely
- 1353 • Inform the person that the information has been shared if they were not already aware of
1354 this and if it would not create or increase risk of harm to them/others.

1355 6.175. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of
1356 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the
1357 need to safeguard and promote the welfare and protect the safety of children.

1358 6.176. Further details on information sharing can be found in:

- 1359 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting
1360 guide to information sharing
- 1361 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children,
1362 Young People, Parents and Carers](#). The seven golden rules for sharing information will
1363 be especially useful
- 1364 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and
1365 guidance from the department
- 1366 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection
1367 activity, including compliance with the GDPR.

1368 6.177. The following wording is to be added to any covering letter where we are sharing documentation:
1369 "The material contained in this letter and its enclosures are confidential to Cambian Group and the
1370 persons named within the documentation. The documentation is delivered only in accordance with a
1371 perceived legal obligation to make the documentation available and upon the strict understanding that
1372 the recipient and all members of the recipient's staff will undertake to preserve confidentiality and not
1373 in any way share the documentation or any details of the information therein contained with any other
1374 party. Any person receiving this information who breaches these obligations of confidentiality will be

1375 held strictly responsible and will be expected to indemnify Cambian Group and any persons named within
1376 the documentation against any losses that may arise as a result of misuse of this material”.

1377 6.178. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for
1378 the Caldicott Guardian at our location is Sarah Longley Cook.

1379 6.179. Failure to follow this policy and local procedure may result in disciplinary action.

1380 **Complaints and Monitoring**

1381 6.180. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**
1382 **procedure**, with reference to the our Designated Safeguarding Officer who is Jennifer Carradus (DSL) and
1383 Westmorland and Furness Safeguarding Children’s Board

1384 **7. Accountability**

1385 7.1. Jennifer Carradus is the DSL at Cambian Whinell School and has lead responsibility for protecting and
1386 safeguarding children, young people and young adults and liaising with the local authority and other local
1387 agencies as appropriate. This includes young person protections, referrals, raising awareness, training,
1388 allocating resources and supporting/directing staff within the Location. In all matters, relating to young
1389 person protection and safeguarding Whinell School will follow the procedures outlined in this policy.

1390 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by
1391 the Head of Service. Our Managing Director, Andrew Sutherland will undertake a full annual review of
1392 the content and effective application of this policy and associated procedures. The date for the next
1393 scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes in
1394 legislation, regulatory requirements or as a result of best practice guidance.

1395 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director
1396 Compliance, who will support and promote the development of initiatives to improve the prevention,
1397 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is
1398 also responsible for reporting on safeguarding and providing executive leadership.

1399 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1400 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can
1401 be stressful and distressing for staff.

1402 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,
1403 allied health professionals and nurses) should understand how their professional standards and
1404 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

1405 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1406 need to share a common view of what types of behaviour may be abuse or neglect and what should be
1407 an initial response to suspicion or allegation of abuse or neglect.

1408 7.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency
1409 safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies
1410 which define the local practice that must be followed.

1411 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable
1412 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact
1413 names and details if required.

1414 **8. Further Safeguarding information – what everyone needs to know** 1415 **(Appendix 12)**

1416 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours
1417 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual
1418 and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children
1419 are at risk. Other safeguarding issues such as child on child/young adult on young adult abuse staff should

1420 be aware of are explored in the **Appendix 12. Further Safeguarding information – what everyone needs**
1421 **to know.**

1422 **9. Appendices**

1423 **Appendix 1: Relevant policies and documents**

1424 **1. Child Protection and Safeguarding**

- 1425 a) 25.01 - Index Form for Individuals Concern File
- 1426 b) 25.02 - Abuse Poster Individual
- 1427 c) 25.03 - Individual Safeguarding booklet – Easy Read
- 1428 d) 25.04 - Concern Form
- 1429 e) 25.05 - Safeguarding Tracking Pack
- 1430 f) 25.06 – Visitor Information Leaflet template
- 1431 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
- 1432 h) 25.08 – Guidance to staff who had an allegation made against them
- 1433 i) 25.09 – Local Safeguarding procedure
- 1434 j) 25.10 – Staff Safeguarding Information poster
- 1435 k) 25.11 – Guidance notes for Designated or On-call person
- 1436 l) 25.12 – Static body chart
- 1437 m) 25.13 – Weekly body chart
- 1438 n) 25.14 – Guidance for Investigating Unexplained Body Marks
- 1439 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian

1440 **2. Whistleblowing**

1441 **3. Anti-bullying**

1442 **4. Child Sexual Exploitation**

1443 **5. Intimate and Invasive Care**

1444 **6. Self-harm and suicide**

1445 **7. Behaviour Support**

1446 **8. Physical Intervention**

1447 **9. Complaints Policy**

1448 **10. Health**

1449 **11. E –safety**

1450 **12. Capacity to consent**

1451 **13. Prevent**

1452 **14. Recruitment**

1453	15.	Code of Conduct
1454	16.	Data Protection
1455	17.	Confidentiality
1456	18.	Disciplinary
1457	19.	Code of Practice
1458	20.	Mobile telephony
1459	21.	SUI Caretech children's services process
1460	22.	Caretech - Group Leaving Policy
1461	23.	GHR 02 – Harassment and Bullying
1462	24.	GHR 41 – Reference Requests
1463	25.	GHR 41.1 DBS referral log
1464		
1465		
1466		
1467		

Appendix 2: Legislation and guidance

1469	•	The Children Act 2004, as amended by the Children and Social Work Act 2017
1470	•	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
1471		
1472	•	Guide to the Young people's/care home Homes Regulations including the Quality Standards (DfE: April 2015)
1473		
1474	•	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)
1475		
1476		
1477	•	The Health and Social Care Act 2008 (Regulated Activities) Regulations 2015
1478	•	Female Genital Mutilation Act 2003, (as inserted by section 74 of the Serious Crime Act 2015)
1479	•	Terrorism Act 2000
1480	•	Counter Terrorism and Security Act 2015
1481	•	The School staffing regulations , England 2009
1482	•	The Teachers Disciplinary regulations, 2012
1483	•	Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.
1484	•	All Wales Child Protection Procedures 2008
1485	•	All Wales POVA Guidance 2008
1486	•	Keeping learners safe GOV.WALES
1487	•	The Care Act 2014
1488	•	Social services and wellbeing Act 2014
1489	•	Working Together to Safeguard Children 2018
1490		Keeping Children Safe in Education 2023
1491	•	Keeping Children Safe in Education 2023 Part 1
1492	•	Regulated activity in relation to children: scope
1493	•	What to do if you're worried a child is being abused
1494	•	Sexual violence and sexual harassment between children in schools and colleges 2021
1495	•	Violence against women and girls

- 1496
- 1497
- 1498
- 1499
- <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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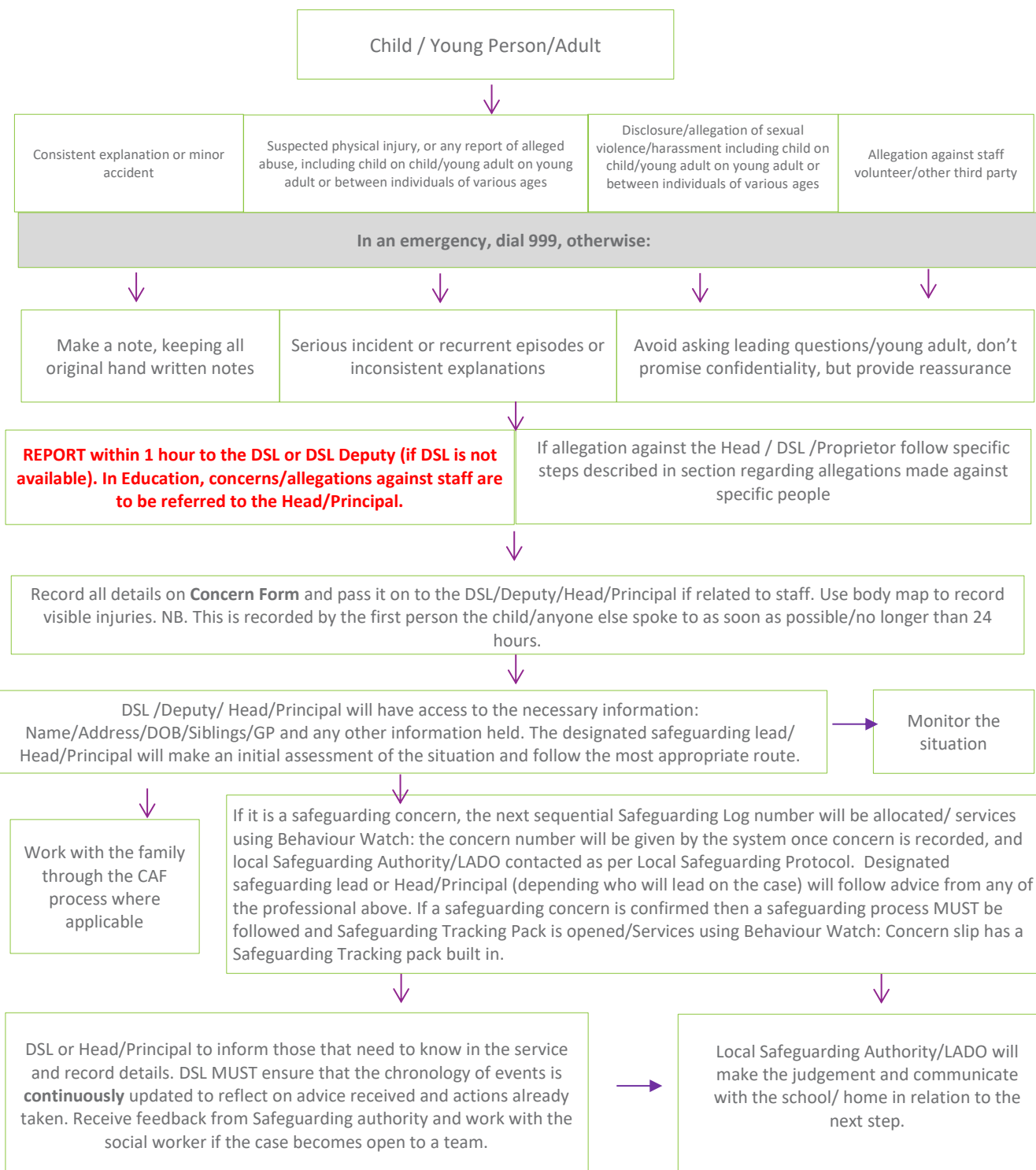
Appendix 3: Child Protection and safeguarding procedure (Flow chart)

DSL– DSL

CSC– Children’s Social Care

CAF – Common Assessment framework

LADO – Local Authority Designated Officer



1588 **Appendix 4: Types of abuse – children**

- 1589 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or
1590 by failing to act to prevent harm. Children may be abused in a family or in an institutional or community
1591 setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or
1592 technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by
1593 another child or children
- 1594 • **Physical abuse:** a form of abuse, which may involve hitting, slapping, shaking, throwing, poisoning,
1595 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm
1596 may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in
1597 a child.
- 1598 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse
1599 effects on the child's emotional development. It may involve conveying to a child that they are worthless
1600 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include
1601 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of
1602 what they say or how they communicate. It may feature age or developmentally inappropriate
1603 expectations being imposed on children. These may include interactions that are beyond a child's
1604 developmental capability as well as overprotection and limitation of exploration and learning, or
1605 preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-
1606 treatment of another. It may involve serious bullying (including cyberbullying), causing children
1607 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of
1608 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1609 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example
1610 rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of
1611 clothing. They may also include non-contact activities, such as involving children in the production of
1612 sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children
1613 to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the
1614 internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual
1615 abuse, as can other children. The sexual abuse of children by other children or young adults by other
1616 young adults or between individuals of different age is a specific safeguarding issue in education and all
1617 staff should be aware of it and of their school or colleges policy and procedures for dealing with it.
- 1618 • **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an
1619 individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child
1620 into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or
1621 for the financial advantage or increased status of the perpetrator or facilitator and/or through violence
1622 or the threat of violence. CSE and CCE can affect children, both male and female and can include children
1623 who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual
1624 Exploitation does not always involve physical contact; it can also occur through the use of technology.
- 1625 • **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result
1626 in the serious impairment of the child's health or development. Neglect may occur during pregnancy as
1627 a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
1628 provide adequate food, clothing and shelter (including exclusion from home or abandonment);
1629 protect a child from physical and emotional harm or danger; ensure adequate supervision (including the
1630 use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also
1631 include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 1632 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through
1633 social media, online games or other channels of digital communication. Children can also be re-victimised
1634 if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal
1635 abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child
1636 sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual
1637 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using
1638 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that
1639 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as
1640 inappropriate behaviours or content online. For instance, children may be bullied online by other
1641 children/young people/young adults they know/others who they don't know or they might, either
1642 accidentally or intentionally, view content, which is intended for adults. Both online abuse and exposure

1643 to unsuitable content or behaviour can have a long-lasting impact on the wellbeing of children and young
1644 people.

1645 Appendix 5: Types of abuse - adults

- 1646 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling,
1647 scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone
1648 purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding
1649 or withholding food, unauthorized restraint, restricting movement.
- 1650 • **Honour based abuse** - encompasses incidents/crimes which have been committed to protect/defend the
1651 honour of the family and/or the community including female genital mutilation (FGM), forced marriage
1652 and practices such as breast ironing. Abuse committed in the context of preserving “honour” often
1653 involves a wider network of family or community pressure and can include multiple perpetrators. It is
1654 important to be aware of this dynamic and additional risk factors when deciding what form of
1655 safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be
1656 handled and escalated as such. Professionals in all agencies, individuals and groups in relevant
1657 communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered
1658 HBA.
- 1659 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse
1660 outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence
1661 and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour,
1662 violence or abuse between those aged 16 or over who are or have been, intimate partners or family
1663 members regardless of gender or sexuality.
- 1664 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual
1665 masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of
1666 the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to,
1667 inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced
1668 use of pornography or witnessing of sexual acts, Indecent exposure.
- 1669 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing
1670 services, educational and social opportunities and seeing friends, removing mobility or communication
1671 aids or intentionally leaving someone unattended when they need assistance, preventing someone from
1672 meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to
1673 respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion,
1674 harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a
1675 patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- 1676 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from
1677 accessing their own money, benefits or assets, employees taking a loan from a person using the service,
1678 undue pressure, duress, threat or undue influence put on the person in connection with loans, wills,
1679 property, inheritance or financial transactions, arranging less care than is needed to save money to
1680 maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to
1681 access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in
1682 a family home, someone moving into a person’s home and living rent free without agreement or under
1683 duress, false representation, using another person's bank account, cards or documents, exploitation of a
1684 person’s money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy,
1685 appointee ship or other legal authority.
- 1686 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as
1687 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that
1688 realistically they never will be able to.
- 1689 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and
1690 civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as
1691 ‘protected characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks or
1692 inappropriate use of language related to a protected characteristic, denying access to communication
1693 aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on
1694 the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and

- 1695 criminal justice relating to a protected characteristic, substandard service provision relating to a
1696 protected characteristic.
- 1697 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-
1698 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and
1699 supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful
1700 attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and
1701 privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or
1702 assistance with eating, not offering choice or promoting independence, misuse of medication, failure to
1703 provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious
1704 or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence
1705 or communication, failure to respond to complaints.
 - 1706 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,
1707 stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure
1708 to administer medication as prescribed, refusal of access to visitors, not taking account of individuals'
1709 cultural, religious or ethnic needs, not taking account of educational, social and recreational needs,
1710 ignoring or isolating the person, preventing the person from making their own decisions, preventing
1711 access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
 - 1712 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of
1713 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,
1714 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise
1715 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more
1716 appropriate under the parts of the Care Act dealing with assessment, planning, information and advice,
1717 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

1767 Unsuitable clothing or not enough clothes

1768

1769 **Domestic abuse**

- 1770 • becoming anxious or depressed
- 1771 • having difficulty sleeping
- 1772 • complaining of physical symptoms such as tummy aches
- 1773 • starting to wet their bed
- 1774 • behaving as though they are much younger than they are
- 1775 • having problems with school
- 1776 • becoming aggressive or they may internalise their distress and withdraw from other people
- 1777 • having a lowered sense of self-worth
- 1778 • older children may begin to play truant or start to use alcohol or drugs
- 1779 • they beginning to self-harm by taking overdoses or cutting themselves

1780

1781 **Child on Child/Young adult on young adult abuse/between individuals of different age**

- 1782 • absence from school or disengagement from school activities
- 1783 • physical injuries
- 1784 • mental or emotional health issues
- 1785 • becoming withdrawn – lack of self esteem
- 1786 • lack of sleep
- 1787 • alcohol or substance misuse
- 1788 • changes in behavior
- 1789 • inappropriate behavior doe age
- 1790 • 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.

1865 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**
1866 **and recording procedure**

- 1867 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within 1
1868 hour from the moment of disclosure/report from the child/young person/other person completes and
1869 passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of
1870 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern is
1871 related to the staff and the Head/Principal is not available, staff must report their concern to the DSL
1872 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal
1873 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally before
1874 completing the Concern/Safeguarding slip in the system.
- 1875 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details
1876 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on
1877 the Concern Form. Services using Behaviour Watch – DSL/DSL Deputy or Head/Principal reviews the
1878 concern and decides on the next step which may lead to Safeguarding Tracking Pack being opened
1879 (Safeguarding Tracking Pack is built as part of the concern slip should the case proceed to safeguarding).
- 1880 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy or
1881 Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on
1882 the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and
1883 immediately (or at least within one hour of receiving the concern form, make a referral to the local
1884 Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to discuss the
1885 allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the Behaviour Watch
1886 system will progress to the next stage – Safeguarding part of the concern/SG slip which is only accessible
1887 to the Safeguarding Team.
- 1888 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a
1889 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on the
1890 Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal
1891 Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy MUST ensure that a member of their
1892 Senior Management Team is assigned to look into the concern. The review must be recorded and
1893 outcomes shared with the people involved. Feedback from the review session MUST be provided to local
1894 Safeguarding Authority/LADO. Services using the Behaviour Watch system will follow the same set of
1895 steps apart from populating the Central Log of Concerns and Safeguarding as the log can be generated
1896 by the system using chosen filtering criteria.
- 1897 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken.
1898 This diligent approach will ensure a clear historic record of contact with local Safeguarding
1899 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with
1900 the local Safeguarding Authority/LADO whichever appropriate.
- 1901 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that it
1902 requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must
1903 be opened with the next sequential Safeguarding Reference included on the form and details as such
1904 entered on the central log.
- 1905 • Services using the Behaviour Watch system – where a concern progresses to Safeguarding Tracking Pack
1906 being opened, a one record will be created including the original concern, with the whole document
1907 having the same slip number.
- 1908 • Services which don't use Behaviour Watch or where the concern/allegation is about the Head/Principal
1909 or the DSL who have access to BW: Copy of **25.05 Safeguarding Tracking Pack** (initially with completed
1910 sec. 1-5) should be submitted to the **Responsible/Nominated Individual and** in day schools - **Regional**
1911 **Education Manager** as a follow up to the initial reporting telephone contact. STP must be sent again to
1912 **Responsible/Nominated Individual and Regional Education Manager** on completion, providing detailed
1913 overview of the actions taken and the final outcome. Services using the Behaviour Watch will be able to
1914 trigger live notification to the Regional Manager (Education/Care), Responsible/Nominated Individual
1915 and Registered Manager – where appropriate. The **Responsible/Nominated Individual and Regional**

- 1916 **Education Manager** in day schools will update relevant Directors. This original form will be saved in the
1917 Safeguarding file/Behaviour Watch – Concern/SG module.
- 1918 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the
1919 local Police should be informed immediately as well and they can take immediate protective action as
1920 necessary.
- 1921 • If the matter is a more general concern then ensure that the ‘Action Taken’ log on the concern form is
1922 completed and the form is filed within the Safeguarding file. Either way the form must be signed by the
1923 DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use
1924 Concern/Safeguarding ‘Other’ slip to record concerns which are not related to children/young people,
1925 staff or children/young people and staff.
- 1926 • The relevant concern form should be referenced in the Individual’s **25.01 Index form for Individual**
1927 **concern/safeguarding file** and the site’s **25.07 Central Log of Concerns and Safeguarding**. Services using
1928 Behaviour Watch will be able to filter information per chosen criteria and also generate reports per each
1929 child/young person in the school, college, children’s or care homes.
- 1930 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack**
1931 **/Behaviour Watch Concern/SG module**.
- 1932 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed in
1933 writing that the concern is closed and Responsible/Nominated Individual and Regional Education
1934 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is
1935 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off**
1936 **have been completed.** Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the Safeguarding
1937 **file.**
- 1938 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local
1939 Authority and/or the police. The individual can be kept in their care home or on the school/college site
1940 fully supported (e.g. if they are a day student) if advised to do so.
- 1941 • The parent/carers should be informed and a decision should be made with the Local Authority and the
1942 Police about what action is to be taken and whom by.
- 1943 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been
1944 said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an
1945 abuse referral but may help to clarify the situation but they must record all details of any conversation
1946 and advice received on a concern form. He/she can then move to a formal referral or actively monitor
1947 the situation.
- 1948 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or
1949 allegation of abuse directed against anyone working within the establishment. The establishment **MUST**
1950 not internally investigate any allegations of abuse without first taking instruction from the local
1951 Safeguarding Authority/LADO.
- 1952 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal
1953 management investigation (level 2), the investigation process will commence.
- 1954 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the
1955 external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps to
1956 assist the external agency to ensure the investigation is completed without a delay.
- 1957 • Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within
1958 the time frame specified by their regulator. This is regardless of who leads on the investigation and
1959 whether or not the investigation has been concluded.
- 1960 • If as the result of an investigation there has been a substantiated allegation against a member of staff,
1961 we will work with the local Safeguarding Authority/LADO to determine whether there are any
1962 improvements to be made to our safeguarding policy, procedures and practice to prevent similar events

1963 in the future. Also, we will work with our internal Human Resources department and may commence
1964 proceedings under **GHR 27. Disciplinary policy and procedure.**

- 1965 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.
1966 Records are kept of all conversations as part of the investigation process and made available as
1967 required.

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Appendix 9: Key contacts

2004

DSL is Jennifer Carradus

Telephone (24hrs) : 07468483492

Email: Jennifer.carradus@cambiagroup.com

DSL Deputy is Emma Brown & Paddy Sandham

Telephone (24hrs): 07544 129 504

Email: Emma.Brown3@cambiagroup.com

07860 752 376

Email: Paddy.Sandham@cambiagroup.com

2010

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

2012

Telephone (24hrs) 01539 723322

2014

Headteacher/Principal Paddy Sandham

2016

Telephone (24hrs) 07860 752 376

Email: Paddy.Sandham@cambiagroup.com

2018

Home Manager is Jennifer Carradus Email: Jennifer.carradus@cambiagroup.com

2020

Telephone (24hrs) 07468483492

2022

Operations Director is Andrew Sunderland

2024

Telephone (24hrs) 07701314378

Email: andrew.sutherland@caretech-uk.com

2026

Managing Director is Insert

2028

Telephone (24hrs)

Email:

2030

Group Executive Director – Children's Services is Jeremy Wiles

2032

Telephone: 079190232207

Email: Jeremy.Wiles@caretech-uk.com

2034

Group Lead Safeguarding is Christina Leath (Compliance and Regulation)

2036

Telephone: 01707 601 800

Email: Christina.Leath@caretech-uk.com

2038

Representative, Proprietor - Caretech Education Services is Andrew Sutherland – Operations Director-Education

Services

2041

Telephone: 07701314378

Email: Andrew.Sutherland@caretech-uk.com

2043

Local authority

2045

Westmorland and Furness Local Authority & Westmorland and Furness Safeguarding Children's Board

2047

2048

Telephone 03003732724

2050

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

2052

Outside of office hours

2054

Cumbria police 101 ext 2

2056



The non-emergency police telephone number is: 101.

2058

For young people under the age of 18:

2060

The Local Authority Designated Officer (LADO) is Laura Cross

2062

Telephone 03003033892 (Office hours: 01768812267. Outside of office hours/weekends, the emergency duty team can be contacted on: 01228526690 telephone number)).

2065

Local Safeguarding Authority

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

2068

Address: Westmorland and Furness Safeguarding Board

Craven House

Michaelson Road

Barrow

LA14 1FD

2074

Telephone (24hrs): 03003732724 Email: safeguarding.hub@westmorlandandfurness.gov.uk

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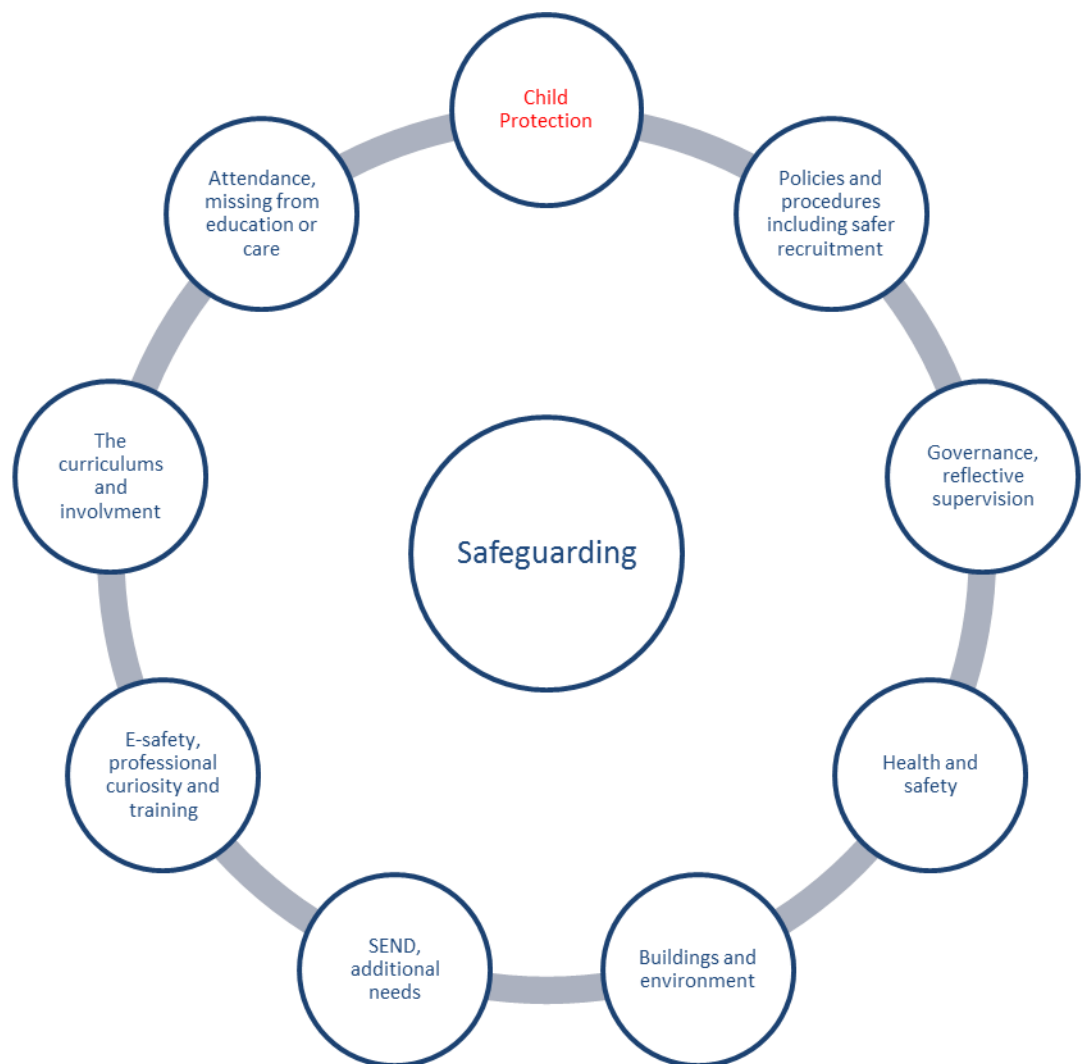
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Appendix 10. Safeguarding in children's Services - illustration



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2133 Appendix 11. Low – level concerns (Education)

2134 9.1. As part of their whole school or college approach to safeguarding, schools and colleges should ensure
2135 that they promote an open and transparent culture in which all concerns about all adults working in or
2136 on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with
2137 promptly and appropriately.

2138 9.2. The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern –
2139 no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an
2140 adult working in or on behalf of the school or college may have acted in a way that:

2141 • is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
2142 and

2143 • does not meet the harm threshold or is otherwise not serious enough to consider a referral to
2144 the LADO.

2145 Examples of such behaviour could include, but are not limited to:

- 2146 • being over friendly with children
- 2147 • having favourites
- 2148 • taking photographs of children on their mobile phone, contrary to school policy
- 2149 • engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- 2150 • humiliating pupils.

2151 Sharing Low - level concerns

2152 9.3. Schools must have their site procedure for sharing low-level concerns which is clear, easy to understand
2153 and implement.

2154 9.4. Whether all low-level concerns are shared initially with the DSL (or other nominated person for example
2155 DSL deputy or with the head teacher/principal is a matter for the school or college to decide. If the former,
2156 then the DSL/DSL Deputy should inform the head teacher/principal of all the low-level concerns and in a
2157 timely fashion according to the nature of each particular low-level concern. **The head teacher/principal**
2158 **should be the ultimate decision maker in respect of all low-level concerns**, although it is recognised that
2159 depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges,
2160 the head teacher/principal may wish to consult with the DSL and take a more collaborative decision-
2161 making approach. Some schools’ or college’s Head teacher/Principal is also the DSL in which case all low
2162 – level concerns should be reported to them or other nominated person for example DSL Deputy).

2163 9.5. Low-level concerns which are shared about supply staff and contractors should be notified to their
2164 employers, so that any potential patterns of inappropriate behaviour can be identified.

2165 9.6. If schools and colleges are in any doubt as to whether the information which has been shared about a
2166 member of staff as a low-level concern in fact meets the harm threshold, they should consult with their
2167 LADO.

2168 9.7. Schools and colleges should ensure they create an environment where staff are encouraged and feel
2169 confident to self-refer, where, for example, they have found themselves in a situation which could be

2170 misinterpreted, might appear compromising to others, and/or on reflection they believe they have
2171 behaved in such a way that they consider falls below the expected professional standards.

2172 9.8. Creating a culture in which all concerns about adults (including allegations that do not meet the harms
2173 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is
2174 critical. If implemented correctly, this should encourage an open and transparent culture; enable schools
2175 and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of
2176 abuse; and ensure that adults working in or on behalf of the school or college are clear about professional
2177 boundaries and act within these boundaries, and in accordance with the ethos and values of the
2178 institution.

2179 **Responding to low - level concerns**

2180 9.9. If the concern has been raised via a third party, the head teacher/principal (or a nominated deputy)
2181 should collect as much evidence as possible by speaking:

- 2182 • directly to the person who raised the concern, unless it has been raised anonymously, and
- 2183 • to the individual involved and any witnesses.

2184 9.10. The information collected will help them to categorise the type of behaviour and determine what further
2185 action may need to be taken. This information needs to be recorded in writing along with the rationale
2186 for their decisions and action taken.

2187 **Recording low - level concerns**

2188 9.11. All low-level concerns should be recorded in writing. The Concern/Safeguarding slip in Behaviour Watch
2189 should be completed, as this is the place to record all concerns being raised. The record should include
2190 details of the concern, the context in which the concern arose, and action taken. The name of the
2191 individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then
2192 that should be respected as far as reasonably possible.

2193 9.12. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or
2194 concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or
2195 college should decide on a course of action, either through its disciplinary procedures or where a pattern
2196 of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be
2197 referred to the LADO.

2198 9.13. Consideration should also be given to whether there are wider cultural issues within the school or college
2199 that enabled the behaviour to occur and where appropriate policies could be revised, or extra training
2200 delivered to minimise the risk of it happening again.

2201 9.14. It is for schools and colleges to decide how long they retain such information, but it is recommended that
2202 it is retained at least until the individual leaves their employment.
2203

2204 Appendix 12. Further Safeguarding information – what everyone needs to know

2205 Contextual safeguarding

2206 9.15. Contextual Safeguarding is ‘an approach to understanding, and responding to, young people’s
2207 experiences of significant harm beyond their families. It recognises that the different relationships that
2208 young people form in their neighbourhoods, schools, colleges, children’s/care homes and online can
2209 feature violence and abuse. Parents and carers have little influence over these contexts, and young
2210 people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore,
2211 children’s social care practitioners need to engage with individuals and sectors who do have influence
2212 over/within extra- familial contexts, and recognise that assessment of, and intervention with, these
2213 spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the
2214 objectives of child protection systems in recognition that young people are vulnerable to abuse in a range
2215 of social contexts.

2216 9.16. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors
2217 outside the school or college and/or can occur between children outside of these environments. All staff,
2218 but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation
2219 in situations outside their families. Extra-familial harms take a variety of different forms and children can
2220 be vulnerable to multiple harms including (but not limited to) sexual exploitation (including harassment
2221 and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse),
2222 criminal exploitation, and serious youth violence, county lines and radicalisation. Further advice is
2223 provided in the [Home Office’s Preventing youth violence and gang involvement](#) and its [Criminal
2224 exploitation of children and vulnerable adults: county lines guidance](#).

2225 9.17. All staff should be aware that technology is a significant component in many safeguarding and wellbeing
2226 issues. Children are at risk of abuse and other risks online as well as face-to-face. In many cases abuse
2227 and other risks will take place concurrently both online and offline. Children can also abuse other children
2228 online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-
2229 consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images
2230 and pornography, to those who do not want to receive such content.

2231 9.18. Children’s social care assessments should consider where children are being harmed in contexts outside
2232 the home (family home, children’s/care home), so it is important that schools, colleges and
2233 children’s/care homes provide as much information as possible as part of the referral process. This will
2234 allow any assessment to consider all the available evidence and enable a contextual approach to address
2235 such harm. More information about Contextual safeguarding can be found on [NSPCC website](#).

2236 9.19. We will consider the various factors that have an interplay with the life of any child/young person about
2237 whom we have concerns within the setting and the level of influence that these factors have on their
2238 ability to be protected and remain free from harm particularly when it comes to child exploitation or
2239 criminal activity.

2240 9.20. Whilst this term applies to this specific definition, the notion of considering a child/young person within
2241 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the
2242 school, college, children’s/care home gates, within their family home when they visit (children attending
2243 residential education), within the family (day students) and within the community (extracurricular off site
2244 activities, events, groups and clubs) are key considerations when the DSL is looking at any concerns.

2245 Bullying

2246 9.21. Our approach to bullying is set out in a separate **0.21. Anti – bullying policy and procedure** acknowledges
2247 that to allow or condone bullying may lead to consideration under child protection procedures. Bullying

2248 is a safeguarding matter that if left unresolved can become a child protection matter. Our settings take
2249 seriously any bullying concerns and both investigate and act to protect Individuals where appropriate.

2250 **Child on child/young adults on young adult/ between children of different age's abuse**

2251 9.22. Boarding schools, residential special schools, residential colleges and children's homes and care homes
2252 for young adults attending education (FE colleges) have additional factors to consider with regard to
2253 safeguarding. Schools and colleges that provide such residential accommodation and/or are registered
2254 as children's homes should be alert to signs of abuse in such settings (for example, inappropriate pupil or
2255 student relationships and the potential for the abuse between individuals of the same/similar age or
2256 different age, particularly in schools and colleges where there are significantly more girls than boys or
2257 vice versa) and work closely with the host local authority and, where relevant, any local authorities that
2258 have placed their children there. All residential setting within the Organisation children's service will
2259 continuously maintain their communication with the internal and external Education providers to ensure
2260 the additional factors are being considered and any concerns shared in a timely manner and with the
2261 right people.

2262 9.23. All staff should be aware that children can abuse other children/young adults can abuse other young
2263 adults and that the abuse can also take place between individuals of different age and that it can happen
2264 both inside and outside of school/college/children's/care home and online. It is important that all staff
2265 recognise the indicators and signs of the abuse and know how to identify it and respond to reports. In
2266 some schools, colleges, children's / care homes site – based or regional members of therapy teams might
2267 need to be involved and support the SLT to identify the most effective ways of communication with the
2268 child/young adult who may have potentially been the victim of child on child/young adult on young adult/
2269 between individuals of different age abuse and who instigated it.

2270 9.24. It must be recognised that children and young people would require varied approaches and
2271 communication mechanisms to be present and available so they can report abuse. Children must be
2272 regularly reassured that their concern/reports will be treated seriously every time they report it.

2273 9.25. Children needs to be told what will happen from the moment their concern is shared, so the lack of
2274 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.
2275 Children need to know that that their concerns will be investigated and dealt with. Child's/young person's
2276 preference in terms of how feedback should be provided must be taken into consideration so this can be
2277 planed for in advance.

2278 9.26. The communication with each individual throughout the process of child on child/young adult on young
2279 adult or between individuals of different age investigation must be regular, proportionate and take place
2280 using suitable communication.

2281 9.27. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn't
2282 receive timely and appropriate support from the school/college, hence the communication and support
2283 must become one of the critical points of a significant priority to those responding to and those managing

2284	child on child/young adult on young adult/between individuals of different age abuse cases including
2285	those of a sexual nature. Other consideration for all providers were:
2286	<ul style="list-style-type: none"> to assume it is happening here and plan accordingly
2287	<ul style="list-style-type: none"> work on and strengthen the whole school, college, children's/care home approach to developing
2288	<ul style="list-style-type: none"> a safeguarding culture
2289	<ul style="list-style-type: none"> to ensure staff model respectful behaviour
2290	<ul style="list-style-type: none"> to ensure children and young people are clear about acceptable and unacceptable behaviour
2291	<ul style="list-style-type: none"> to ensure children/young people are confident to ask for help
2292	<ul style="list-style-type: none"> to ensure carefully planned and implemented RSHE curriculum
2293	<ul style="list-style-type: none"> to ensure the behavioural approach with sanctions & interventions for poor behaviour
2294	<ul style="list-style-type: none"> to have mechanisms to support students who need it in the way they need it
2295	<ul style="list-style-type: none"> to ensure staff have access to suitable training & that there is clear expectation for staff and
2296	<ul style="list-style-type: none"> Managers
2297	<ul style="list-style-type: none"> to ensure pupil's voice is heard and responded to
2298	<ul style="list-style-type: none"> to ensure DSLs have some protected time to engage with local safeguarding partners and LADOs,
2299	<ul style="list-style-type: none"> so those relationships can be strengthened.
2300	<ul style="list-style-type: none"> to ensure staff follow the guidance in Keeping Children Safe in Education
2301	
2302	9.28. All staff should understand that even if there are no reports in their schools or colleges it does not mean
2303	it is not happening, it may be the case that it is just not being reported. As such, it is important if staff
2304	have any concerns regarding child on child/young adult on young adult abuse or abuse between
2305	individuals of different age, they should speak to their DSL (or deputy).
2306	9.29. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and
2307	harassment. Staff must NOT take the view that it doesn't not happen in their setting.
2308	9.30. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but that
2309	all types of abuse between children of the same, similar of different ages is unacceptable and will be

2310 taken seriously. It is essential that all victims are reassured that they are being taken seriously and that
2311 they will be supported and kept safe.

2312 9.31. Abuse between individuals of the same, similar or different age is most likely to include, but may not be
2313 limited to:

- 2314
- 2315 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - 2316 • abuse in intimate personal relationships between peers
 - 2317 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
2318 (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - 2319 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
2320 element which facilitates, threatens and/or encourages sexual violence). For further information about
2321 sexual violence see [Part 5 of KCSIE 2023 and Annex B](#)
 - 2322 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may
2323 be standalone or part of a broader pattern of abuse; For further information about sexual harassment
2324 see [Part 5 of KCSIE 2023 and Annex B](#)
 - 2325 • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch
2326 themselves sexually, or to engage in sexual activity with a third party
 - 2327 • consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as
2328 sexting or youth produced sexual imagery). For more information about this read UKCIS guidance:
2329 [Sharing nudes and semi-nudes advice for education settings](#).
 - 2330 • Upskirting which typically involves taking a picture under a person's clothing without their permission,
2331 with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim
2332 humiliation, distress or alarm; and

2333 9.32. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or
2334 humiliation used as a way of initiating a person into a group and may also include an online element)

2335 9.33. Staff must be clear as to the school/college's/home's procedures with regards to child on child/young
2336 adult on young adult abuse, abuse between individuals of different age and the important role they have
2337 to play in preventing it and responding where they believe a child may be at risk from it.

2338 9.34. All Individuals will be provided with safeguarding information in a format, which is appropriate for their
2339 understanding and communication. This may take the form of posters or a leaflet/booklet.

2340 9.35. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing
2341 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be
2342 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.
2343 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated or
2344 acceptable. However, it is critical to state that some children with cognitive impairment may not be able
2345 to fully understand how children on the receiving end of such behaviour may feel, therefore staff will
2346 work with each of the children affected by the situation in order to enhance their understanding of the
2347 seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

2348 Serious violence

2349 9.36. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with
2350 serious violent crime. These may include increased absence from school, a change in friendships or
2351 relationships with older individuals or groups, a significant decline in performance, signs of self-harm or
2352 a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new
2353 possessions could also indicate that children have been approached by, or are involved with; individuals
2354 associated with criminal networks or gangs and may be at risk of criminal exploitation.

2355 9.37. All staff should be aware of the range of risk factors which increase the likelihood of involvement in
2356 serious violence, such as being male, having been frequently absent or permanently excluded from
2357 school, having experienced child maltreatment and having been involved in offending, such as theft or

- 2358 robbery. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and
2359 gang involvement and its [Preventing youth violence and gang involvement](#).
- 2360 9.38. Sexual violence and sexual harassment can occur between two or more children of any age and sex, from
2361 primary through to secondary stage and into college. It can occur also through a group of children sexually
2362 assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment
2363 exist on a continuum and may overlap; they can occur online and face-to-face (both physically and
2364 verbally) and are never acceptable. Schools and colleges should be aware of the importance of:
- 2365 • making clear that there is a zero-tolerance approach to sexual violence and sexual harassment
2366 that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”,
2367 “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a
2368 culture of unacceptable behaviour, an unsafe environment and in worst-case scenarios a culture
2369 that normalises abuse, leading to children accepting it as normal and not coming forward to
2370 report it.
 - 2371 • recognising, acknowledging, and understanding the scale of harassment and abuse and that
2372 even if there are no reports it does not mean it is not happening, it may be the case that it is just
2373 not being reported.
 - 2374 • challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts
2375 and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating
2376 such behaviours risks normalising them.
- 2377 9.39. Sexual violence and sexual harassment between children can occur between two children of **any age and**
2378 **sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur through
2379 a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2380 9.40. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful
2381 and distressing. This will, in all likelihood, adversely affect their educational attainment and will be
2382 exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same
2383 children’s/care home. Sexual violence and sexual harassment exist on a continuum and may overlap; they
2384 can occur online and face to face (both physically and verbally) and are never acceptable. All staff working
2385 with children are advised to maintain an attitude of ‘it could happen here’.
- 2386 9.41. It is essential that all victims are reassured that they are being taken seriously and that they will be
2387 supported and kept safe. **A victim should never be given the impression that they are creating a problem**
2388 **by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel ashamed
2389 for making a report.
- 2390 9.42. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that
2391 victims are protected, offered appropriate support and every effort is made to ensure their education is
2392 not disrupted. It is also important that other children, adult students and school and college staff are
2393 supported and protected as appropriate.
- 2394 9.43. There is support available for schools and colleges. [Part 5 of KCSIE 2023 p110](#) provides detailed
2395 information and links to resources.
- 2396 9.44. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with
2397 special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2398 9.45. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm.
2399 However, children who are LGBT can be targeted by other children. In some cases, a child who is

- 2400 perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children
2401 who identify as LGBT.
- 2402 9.46. Risks can be compounded where children/young people who are LGBT lack a trusted adult with whom
2403 they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and
2404 provide a safe space for them to speak out or share their concerns with members of staff.
- 2405 9.47. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health](#)
2406 [Education](#) curriculum and there is a range of support available to help schools counter homophobic,
2407 biphobic and transphobic bullying and abuse.
- 2408 9.48. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to
2409 inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is
2410 developmentally inappropriate and may cause developmental damage. An umbrella term for these types
2411 of behaviour are often referred to as "**harmful sexual behaviour**". The term has been widely adopted in
2412 child protection. Harmful sexual behaviour can occur online and/or offline and can also occur
2413 simultaneously between the two. Harmful sexual behaviour should be considered in a child protection
2414 context.
- 2415 9.49. Situations where children/young people are forced or coerced into sexual activity by peers or associates
2416 can be related with gang / serious youth violence activity but that is not always the case. Peer influence
2417 or peer pressure is a major factor in the decisions made by young people to join particular groups. Many
2418 young people see it as a "way out" from their day-to-day life and feel a strong bond with their peers, one
2419 which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying
2420 include:
- 2421 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and
2422 psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or
2423 worthless because of their colour, ethnicity, culture, faith community, national origin or
2424 national status.
 - 2425 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality
2426 or gender is used as a weapon by boys or girls, this may also include any of the following:
 - 2427 - spreading rumors about someone's alleged sex life
 - 2428 - using offensive terms to describe a person
 - 2429 - inappropriate touching or attempts to do so
 - 2430 - non-consensual sharing of sexual images and videos
 - 2431 - unwanted sexual comments and messages, including those on social media
 - 2432 - any sexual exploitation, coercion and threats
 - 2433 - sexual assault and rape
 - 2434 • **Upskirting** - taking a picture under a person's clothing without their permission and /or
2435 knowledge, with the intention of viewing their genitals or buttocks (with or without
2436 underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
2437 It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism Offences Act,
2438 which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came
2439 into force on 12 April 2019.
 - 2440 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are
2441 transgender, thought to be transgender, or whose gender expression doesn't conform to

- 2442 traditional gender roles. Transphobia can prevent transgender and gender
2443 nonconforming people from living full lives free from harm.
- 2444 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived
2445 sexual orientation);
- 2446 • **Disablist Bullying** - targets a young person solely based on their disability. This can include
2447 manipulative bullying where a perpetrator forces the victim to act in a certain way, or
2448 exploiting a certain aspect of the victim's disability.
- 2449 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect
2450 attitude (usually negative) towards an individual based solely on the individual's
2451 membership of a social group. For example, a person may hold prejudiced views towards
2452 a certain race or gender etc. (e.g. sexist).
- 2453 • **Discrimination** is the behaviour or actions, usually negative, towards an individual or
2454 group of people, especially on the basis of sex/race/social class.
- 2455 9.50. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE 2023 Part 5: Child](#)
2456 [on child sexual violence and harassment](#)
2457 What staff should do if they have concerns about the child/young person
- 2458 9.51. Staff working with children/young people are advised to maintain an attitude of 'it could happen here'
2459 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff
2460 should always act in the best interests of the child/young person
- 2461 9.52. If staff have any concerns about a child's/young person welfare, they should act on them immediately by
2462 following this procedure and reporting their concern to the DSL/DSL Deputy.
- 2463 **Opportunities to teach safeguarding**
- 2464 9.53. Schools/colleges must ensure that their staff undergo regular updated safeguarding training, including
2465 online safety and for children to be taught about how to keep themselves and others safe, including
2466 online, that safeguarding training for staff, including online safety training, is integrated, aligned and
2467 considered as part of the whole school or college safeguarding approach and wider staff training and
2468 curriculum planning.
- 2469 9.54. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities
2470 of individual children/young people, including those who are victims of abuse, and children/young people
2471 with special educational needs or disabilities.
- 2472 9.55. Whilst considering the above training requirements, governance boards and proprietor should have
2473 regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour
2474 effectively to ensure a good and safe educational environment and requires teachers to have a clear
2475 understanding of the needs of all pupils.
- 2476 9.56. Schools and colleges play a crucial role in preventative education. Preventative education is most
2477 effective in the context of a whole-school or college approach that prepares pupils and students for life
2478 in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia,
2479 biphobic and sexual violence/harassment.
- 2480 9.57. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may
2481 cover relevant issues through tutorials). This may include covering relevant issues for schools through
2482 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary
2483 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found
2484 here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health](#)
2485 [education.](#)
- 2486 9.58. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:
2487 [Teaching about relationships sex and health](#). This includes teacher-training modules on the RSHE topics

2488 and non-statutory implementation guidance. The following resources plus many more listed in [Annex B](#),
2489 may also help schools and colleges understand and teach about safeguarding:

- 2490 • DfE advice for schools: [teaching online safety in schools](#);
- 2491 • UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#);
- 2492 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with](#)
2493 [children and young people](#);
- 2494 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum
2495 impact of any online safety sessions delivered by external visitors;
- 2496 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2497 • LGFL '[Undressed](#)' provided schools advice about how to teach young children about being
2498 tricked into getting undressed online in a fun way without scaring them or explaining the
2499 motives of sex offenders.
- 2500 • Public Health England: [Every Mind Matters](#)
- 2501 • [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any
2502 online challenges and hoaxes, sharing information with parents and carers and where to
2503 get help and support.

2504 9.59. Whilst it is essential that governance boards and proprietor ensure that appropriate filters and
2505 monitoring systems are in place, they should be careful that “over blocking” does not lead to
2506 unreasonable restrictions as to what children can be taught with regard to online teaching and
2507 safeguarding

2508 9.60. As schools and colleges increasingly work online, it is essential that children are safeguarded from
2509 potentially harmful and inappropriate online material. Whilst it is essential that governance boards and
2510 proprietor ensure that appropriate filters and monitoring systems are in place, they should be careful
2511 that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with
2512 regard to online teaching and safeguarding

2513 Online safety

2514 9.61. It is essential that children are safeguarded from potentially harmful and inappropriate online material.
2515 An effective whole school and college approach to online safety empowers a school or college to protect
2516 and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify,
2517 intervene in, and escalate any concerns where appropriate.

2518 9.62. The breadth of issues classified within online safety is considerable, but can be categorised into four areas
2519 of risk which we'll refer to as 4Cs later on:

- 2520 • **content:** being exposed to illegal, inappropriate or harmful content, for example:
2521 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation
2522 and extremism.
- 2523 • **contact:** being subjected to harmful online interaction with other users; for example: peer
2524 to peer pressure, commercial advertising and adults posing as children or young adults with
2525 the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- 2526 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for
2527 example, making, sending and receiving explicit images (e.g. consensual and non-

2528 consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit
2529 images and online bullying; and

2530 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or
2531 financial scams. If you feel your pupils, students or staff are at risk, please report it to the
2532 Anti-Phishing Working Group <https://apwg.org/>

2533 9.63. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and
2534 implementing policies and procedures. This will include considering how online safety is reflected as
2535 required in all relevant policies and considering online safety whilst planning the curriculum, any teacher
2536 training, the role and responsibilities of the DSL and any parental engagement.

2537 Online safety policy

2538 9.64. Online safety and the school or college's approach to it should be reflected in the child protection policy.
2539 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college
2540 should have a clear policy on the use of mobile and smart technology. Amongst other things this will
2541 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone
2542 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually
2543 harass their peers via their mobile and smart technology, share indecent images: consensually and non-
2544 consensually (often via large chat groups), and view and share pornography and other harmful content.
2545 Schools and colleges should carefully consider how this is managed on their premises and reflect in their
2546 mobile and smart technology policy and their child protection policy.

2547 9.65. Information and support available to schools and colleges to keep children safe online can be found in
2548 [Part 2 and Annex B of KCSIE 2023](#).

2549 Remote Learning

2550 9.66. The DfE has provided advice to support schools and colleges to help keep pupils, students and staff safe
2551 whilst learning remotely, [safeguarding in schools colleges and other providers](#) and [safeguarding and](#)
2552 [remote education](#). The NSPCC also provide helpful advice - [Undertaking remote teaching safely](#). NSPCC
2553 Learning - [Undertaking remote teaching safely during school closures](#).

2554 9.67. Schools and colleges are likely to be in regular contact with parents and carers. Those communications
2555 should be used to reinforce the importance of children being safe online and parents and carers are likely
2556 to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It
2557 will be especially important for parents and carers to be aware of what their children are being asked to
2558 do online, including the sites they will asked to access and be clear who from the school or college (if
2559 anyone) their child is going to be interacting with online

2560 Filters and monitoring

2561 9.68. Whilst considering their responsibility to safeguard and promote the welfare of children and provide
2562 them with a safe environment in which to learn, governance boards and proprietor should be doing all
2563 that they reasonably can to limit children's exposure to the above risks from the school's or college's IT
2564 system. As part of this process, governance boards and proprietor should ensure their school or college
2565 has appropriate filters and monitoring systems in place. Governance boards and proprietor should
2566 consider the age range of their children, the number of children, how often they access the IT system and
2567 the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech IT team and
2568 seek advice and support required.

2569 9.69. The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges
2570 and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK Safer Internet

2571 Centre has published guidance as to what “appropriate” filtering and monitoring might look like UK Safer
2572 Internet Centre: [appropriate filtering and monitoring](#).

2573 Information security and access management

2574 9.70. Education settings are directly responsible for ensuring they have the appropriate level of security
2575 protection procedures in place, in order to safeguard their systems, staff and learners and review the
2576 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
2577 Guidance on e-security is available from the National Education Network. In addition, broader guidance
2578 on cyber security including considerations for governors and trustees can be found at NCSC.GOV.UK.

2579 Reviewing online safety

2580 9.71. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should
2581 consider carrying out an annual review of their approach to online safety, supported by an annual risk
2582 assessment that considers and reflects the risks their children face. A free online safety self-review tool
2583 for schools can be found via the [360 safe website](#).

2584 9.72. UKCIS has published [online safety in schools and colleges: Questions from the governing board](#). The
2585 questions can be used to gain a basic understanding of the current approach to keeping children safe
2586 online; learn how to improve this approach where appropriate; and find out about tools, which can be
2587 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of
2588 trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development
2589 and monitoring.

2590 Cyberbullying

2591 9.73. Central to Anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all
2592 children/young people have a right not to be bullied’. School/colleges also recognises that it must take
2593 note of bullying perpetrated outside school/college which spills over into the school/college; therefore

2594 once aware services will respond to any cyber-bullying we become aware of carried out by
2595 children/young people when they are away from the site.

2596 9.74. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using
2597 electronic forms of contact repeatedly over time against a victim who cannot easily defend
2598 himself/herself.’

2599 • By cyber-bullying, we mean bullying by electronic media:

2600 • Bullying by texts or messages or calls on mobile ‘phones

2601 • The use of mobile ‘phone cameras to cause distress, fear or humiliation

2602 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,
2603 personal websites, social networking sites

2604 • Using e-mail to message others

2605 • Hijacking/cloning e-mail accounts

2606 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2607 9.75. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory
2608 information in any media including internet sites.

2609 9.76. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public
2610 electronic communications network, a message or other matter that is grossly offensive or one of an
2611 indecent, obscene or menacing character.

2612 9.77. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct
2613 amounting to harassment.

2614 9.78. If services become aware of any incidents of cyberbullying, they will need to consider each case
2615 individually as to any criminal act that may have been committed. The services will pass on information
2616 to the police if it feels that it is appropriate or is required to do so.

2617 **Gaming – raising awareness**

2618 9.79. Online gaming is an activity in which the majority of children and young people and many adults get
2619 involved. The services will raise awareness by talking to children/young people/key workers/staff and
2620 also where appropriate parents/carers involved about the games their children play and help them
2621 identify whether they are appropriate.

2622 **Nudes/semi nudes’ images or videos**

2623 9.80. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others,
2624 or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops -
2625 any device that enables the sharing of media and messages. Sexting may also be called: trading nudes,
2626 dirties, pic for pic.

2627 9.81. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the
2628 person doing it is a child. A young person is breaking the law if they:

2629 • take an explicit photo or video of themselves or a friend

2630 • share an explicit image or video of a child, even if it’s shared between children of the same age

2631 • possess, download or store an explicit image or video of a child, even if the child gave their permission
2632 for it to be created.

2633 9.82. However, if a young person is found creating or sharing images, the police can choose to record that a
2634 crime has been committed but that taking formal action isn't in the public interest. There are many

2635 reasons why a young person may want to send a naked or semi-naked picture, video or message to
2636 someone else:

- 2637 • joining in because they think that ‘everyone is doing it’
- 2638 • boosting their self-esteem
- 2639 • flirting with others and testing their sexual identity
- 2640 • exploring their sexual feelings
- 2641 • to get attention and connect with new people on social media
- 2642 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the person
2643 asking is persistent

2644 9.83. The risks of sexting are that the young person has no control over the images and how these are shared,
2645 and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide
2646 education and guidance to prevent individuals from becoming victims of such situations by encouraging
2647 them to think about the risk of sexting and understand how to seek help when approached to take part
2648 in sexting. More information can be found on [Keeping-children-safe/online-safety/sexting-sending-
2649 nudes](#).

2650 **Online reputation**

2651 9.84. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed
2652 by posts, photos that have been uploaded and comments made by others on people’s profiles. It is
2653 important that children/young people and staff are aware that anything that is posted could influence
2654 their future professional reputation. The majority of organisations and work establishments now check
2655 digital footprint before considering applications for positions or places on courses.

2656 **Grooming**

2657 9.85. On-line grooming is the process by which one person with an inappropriate sexual interest in
2658 children/young people will approach a child/young person on-line, with the intention of developing a

2659 relationship with that child/young person, to be able to meet them in person and intentionally cause
2660 harm.

2661 9.86. The services will build awareness amongst children/young people, parents/carers and staff about
2662 ensuring that the child/young person:

2663 • Only has friends on-line that they know in real life

2664 • Is aware that if they communicate with somebody that they have met on-line, that relationship should
2665 stay on-line.

2666 9.87. Where appropriate that the services will support parents/carers to:

2667 • Recognise the signs of grooming

2668 • Have regular conversations with their children/young people about on-line activity and how to stay
2669 safe on-line

2670 9.88. Where appropriate the services will raise awareness by:

2671 • Regular communication with the families

2672 • Schools/colleges will include awareness around grooming as part of their curriculum

2673 • Identifying with the families and children/young people how they can be safeguarded against
2674 grooming.

2675 **Violence against women and girls (VAWG)**

2676 9.89. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women
2677 and girls. The government has a strategy looking at specific issues that women and girls face.

2678 9.90. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to
2679 equal participation of women and men in social, economic, and political spheres. Such violence impedes
2680 gender equality and the achievement of a range of development outcomes. VAWG is a complex and
2681 multifaceted problem that cannot effectively be addressed from a single vantage point. The prevention
2682 of and response to such violence require coordinated action across multiple sectors.
2683

2684 **Female genital mutilation (FGM)**

2685 9.91. FGM comprises all procedures involving partial or total removal of the external female genitalia or other
2686 injury to the female genital organs for non-medical reasons, hence interferes with the natural function of
2687 girls and women's bodies. It has no health benefits and harms girls and women in many ways.

2688 9.92. The age at which girls undergo FGM varies enormously according to the community in which they live.
2689 The procedure may be carried out when the girl is new born, during childhood or adolescence, just before
2690 marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place
2691 between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

2692 9.93. In 2003, FGM became a criminal offence for UK nationals or permanent UK residents to take their child
2693 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty
2694 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

2695 **Forced marriage**

2696 9.94. In the case of children and young people: 'a forced marriage is a marriage in which one or both spouses
2697 cannot consent to the marriage and duress is involved. Duress can include physical, psychological,

2698 financial, sexual and emotional pressure.’ In developing countries, approx. 11% of girls are married before
2699 the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2700 9.95. It is important that all members of staff recognise the presenting symptoms, know how to respond if
2701 there are concerns and where to turn for advice.

2702 9.96. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**
2703 and locally through the local police safeguarding team or children’s social care.

2704 9.97. While all members of staff (education, care, clinical) have important responsibilities with regard to
2705 children, young people or adults who may be at risk of forced marriage, managers and leaders should not
2706 undertake roles in this regard that are most appropriately discharged by other children’s services
2707 professionals such as police officers or social workers.

2708 9.98. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced
2709 marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory
2710 guidance for dealing with forced marriage, which can both be found at [The Right to Choose: Multi-agency](#)
2711 [statutory guidance for dealing with forced marriage](#). School and college staff can contact the Forced
2712 Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufcdo.gov.uk.

2713 **Breast ironing**

2714 9.99. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's
2715 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically
2716 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and
2717 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue
2718 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where
2719 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports
2720 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used
2721 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2722 9.100. Any suspected cases of breast ironing **MUST** be reported immediately under this Child Protection and
2723 Safeguarding policy and the Individual offered medical help.

2724 **Teenage relationship abuse**

2725 9.101. Research has shown that teenagers don’t readily understand what constitutes abusive behaviour such as
2726 controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them
2727 what to wear, who they can/can't see or speak to and that this abuse is prevalent within teen
2728 relationships.

2729 9.102. Further research shows that teenagers don’t understand what consent means within their relationships.
2730 They often hold the common misconception that rape can only be committed by a stranger down a dark
2731 alley and don’t understand that it could happen within their own relationships. This can lead to these
2732 abusive behaviours feeling ‘normal’ and therefore unchallenged, as they are not recognised as being
2733 ‘abusive’.

2734 9.103. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their
2735 own, their peers or others behaviour towards them. Therefore, significant effort will be made to raise
2736 awareness of it and respond effectively to such situations.

2737 9.104. In response to this Cambian Group will provide education and guidance to prevent teenagers from
2738 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views of
2739 violence, abuse and controlling behaviours, and understand what consent means within relationships.

2740 **Honour-based violence**

2741 9.105. It is often linked to family members or acquaintances who mistakenly believe someone has brought
2742 shame to their family or community by doing something that is not in keeping with the traditional beliefs
2743 of their culture. However, abuse committed in the context of preserving “honour” often involves a wider
2744 network of family or community pressure and can include multiple perpetrators. It is important to be

2745 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take”
2746 for example, honour-based violence might be committed against individuals who:

- 2747 • become involved with a boyfriend or girlfriend from a different culture or religion
- 2748 • want to get out of an arranged marriage
- 2749 • want to get out of a forced marriage
- 2750 • wear clothes or take part in activities that might not be considered traditional within a particular
- 2751 culture.

2752 9.106. Girls and women are the most common victims of honour-based violence however; it can also affect men
2753 and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’
2754 might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced
2755 marriage, being held against their will or taken somewhere they don’t want to go.

2756 9.107. If staff believe that the Individual is at risk from honour-based violence, the DSL will follow the usual
2757 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is
2758 at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on
2759 teachers. It is important that if honour-based violence is known or suspected, communities and family
2760 members must NOT be contacted prior to referral to the police or social care as this could increase the
2761 risk to the individual.

2762 Preventing extremism and radicalisation

2763 9.108. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism
2764 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**
2765 **Extremism and Radicalisation policy** and **0.27 E-safety policy**, we all need to be vigilant in ensuring the
2766 safety from extremist and terrorist material when accessing the internet. We consider Westmorland and
2767 Furness Local Authority Safeguarding Children’s Board arrangements to fulfil its Prevent duties.

2768 9.109. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other
2769 forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges’
2770 safeguarding approach.

- 2771 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the
- 2772 rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- 2773 This also includes calling for the death of members of the armed forces.

- 2774 • **Radicalisation** refers to the process by which a person comes to support terrorism and extremist
- 2775 ideologies associated with terrorist groups.

- 2776 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes
- 2777 serious damage to property; or seriously interferes or disrupts an electronic system. The use or
- 2778 threat **must** be designed to influence the government or to intimidate the public and is made
- 2779 for the purpose of advancing a political, religious or ideological cause.

2780 9.110. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
2781 Background factors combined with specific influences such as family and friends may contribute to a
2782 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social
2783 media or the internet) and settings (such as within the home).

2784 9.111. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent
2785 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to
2786 changes in children’s behaviour, which could indicate that they may be in need of help or protection.

2787 Staff should use their judgement in identifying children who might be at risk of radicalisation and act
2788 proportionately which may include making a Prevent referral.

2789 9.112. The school's or college's DSL (and any deputies) should be aware of local procedures for making a Prevent
2790 referral

2791 9.113. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act
2792 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent
2793 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2794 9.114. [An online general awareness-training module on Channel is available](#). The module is suitable for school
2795 staff and other front-line workers. It introduces the topics covered by this advice, including how to
2796 identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types
2797 of intervention that may be appropriate, in addition to Channel.

2798 **Prevent Duty**

2799 9.115. The Prevent duty should be seen as part of schools and colleges' wider safeguarding obligations. DSLs
2800 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance
2801 for England & Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also
2802 covers childcare). DSLs and other senior leaders in colleges should familiar themselves with the [Prevent
2803 duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms
2804 of four general themes: risk assessment, working in partnership, staff training, and IT policies.

2805 9.116. Local authorities will be expected to ensure appropriate frontline staff, including those of its contractors,
2806 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into terrorism
2807 and are aware of available programmes to deal with this issue.

2808 9.117. As the independent body responsible for standards and quality improvement for further education, the
2809 Education and Training Foundation will work with the sector to ensure that appropriate training is
2810 available. This will include and draw from training provided through the network of Prevent co-
2811 ordinators.

2812 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

2813 9.118. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2814 9.119. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an
2815 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity,
2816 in exchange for something the victim needs or wants, and/or for the financial advantage or increased
2817 status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can
2818 affect children, both male and female and can include children who have been moved (commonly
2819 referred to as trafficking) for the purpose of exploitation.

2820 **Child Criminal Exploitation (CCE)**

2821 9.120. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or
2822 money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be
2823 forced or manipulated into committing vehicle crime or threatening/committing serious violence to
2824 others. Children can become trapped by this type of exploitation as perpetrators can threaten victims
2825 (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying
2826 weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As
2827 children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims
2828 is not always recognised by adults and professionals, (particularly older children), and they are not
2829 treated as victims despite the harm they have experienced. They may still have been criminally exploited
2830 even if the activity appears to be something they have agreed or consented to.

2831 9.121. It is important to note that the experience of girls who are criminally exploited can be very different to
2832 that of boys. The indicators may not be the same; however, professionals should be aware that girls are

2833 at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally
2834 exploited may be at higher risk of sexual exploitation.

2835 **Child Sexual Exploitation (CSE)**

2836 9.122. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by
2837 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing,
2838 and touching outside clothing. It may include noncontact activities, such as involving children in the
2839 production of sexual images, forcing children to look at sexual images or watch sexual activities,
2840 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for
2841 abuse including via the internet.

2842 9.123. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate
2843 knowledge e.g. through others sharing videos or images of them on social media.

2844 9.124. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17
2845 year olds who can legally consent to have sex. Some children may not realise they are being exploited
2846 e.g. they believe they are in a genuine romantic relationship.

2847 9.125. Children with learning difficulties can be particularly vulnerable to exploitation as can children from
2848 particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual
2849 emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who
2850 go missing from home or school, children involved in crime, children with parents/carers who have
2851 mental health problems, learning difficulties/other issues, children who associate with other children
2852 involved in exploitation. However, it is important to recognise that any child can be targeted.

2853 9.126. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors
2854 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or
2855 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants
2856 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or
2857 facilitator.

2858 9.127. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of
2859 18 years, including 16- and 17-year olds who can legally consent to have sex) or adults. It is critical to
2860 know that children/young people may also be exploited by other children/young people, who themselves
2861 may be experiencing exploitation – where this is the case, it is important that the child/young person
2862 perpetrator is also recognised as a victim.

2863 9.128. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic
2864 to complex organised abuse. It can involve force and/or enticement-based methods of compliance and
2865 may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when
2866 activity appears consensual and it should be noted exploitation as well as being physical can be facilitated

2867 and/or take place online. More information include definitions and indicators are included in [KCSIE 2023-](#)
2868 Some of the following can be indicators of both child criminal and sexual exploitation where children:

- 2869 • appear with unexplained gifts or new professions;
- 2870 • associate with other young people involved in exploitation;
- 2871 • suffer from changes in emotional well-being;
- 2872 • misuse drugs and alcohol;
- 2873 • go missing for periods of time or regularly or come home late; and
- 2874 • regularly miss school or education or do not take part in education.

2875 9.129. Some additional specific indicators that may be present in CSE and children who:

- 2876 • Children who have older boyfriends or girlfriends; and
- 2877 • Children who suffer from sexually transmitted infections, display sexual behaviours
2878 beyond expected sexual development or become pregnant.

2879 9.130. Further information on signs of a child's involvement in sexual exploitation is available in Home Office
2880 guidance: Child sexual exploitation: guide for practitioners.

2881 9.131. As an organisation we do recognise that the same level of exploitation may take place involving
2882 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged 18
2883 years or over and at risk of abuse or neglect because of their needs for care and/or support (The Care Act
2884 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is expected that
2885 the above statement will equally apply to those who are 18+ across England and Wales.

2886 9.132. Children under the age of criminal responsibility (under the age of 10), or young people who have
2887 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into criminal
2888 activity provide opportunity for criminals to distance themselves from crime.

2889 **County Lines**

2890 9.133. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal
2891 drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as
2892 well as across the UK - no specified distance of travel is required. Children and vulnerable adults are
2893 exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation,
2894 violence (including sexual violence) and weapons to ensure compliance of victims. Children can be
2895 targeted and recruited. Exploitation is an integral part of the county lines, children may become victims
2896 through: coercion, intimidation, violence (including sexual) and weapons.

2897 9.134. Children can be targeted and recruited into county lines in a number of locations including schools,
2898 further and higher educational institutions, pupil referral units, special educational needs schools,
2899 children's homes and care homes. Children are often recruited to move drugs and money between
2900 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed
2901 internally to avoid detection. Children can easily become trapped by this type of exploitation as county
2902 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their
2903 families) if they attempt to leave the county lines network.

2904 9.135. Children are also increasingly being targeted and recruited online using social media. Children can easily
2905 become trapped by this type of exploitation as county lines gangs can manufacture drug debts which
2906 need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they
2907 attempt to leave the county lines network. These children and young people are at serious risk of
2908 criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group who may not

2909 necessarily be affiliated to a gang, but who have developed networks across geographical boundaries to
2910 access and exploit existing drugs markets in these areas.

2911 9.136. The group, or individuals exploited by them, travel regularly between the urban hub and the rural
2912 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply
2913 but is generally more frequent and in smaller deal amounts compared to most other drug supply
2914 methods.

2915 9.137. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are
2916 involved in county lines. Some additional specific indicators that may be present where a child is
2917 criminally exploited through involvement in county lines are children who:

- 2918 • go missing and are subsequently found in areas away from their home;
- 2919 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 2920 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and
2921 collecting money for drugs;
- 2922 • are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid
2923 detection;
- 2924 • are found in accommodation that they have no connection with, often called a 'trap house or
2925 cuckooing' or hotel room where there is drug activity;
- 2926 • owe a 'debt bond' to their exploiters;
- 2927 • have their bank accounts used to facilitate drug dealing.

2928 9.138. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be
2929 considered alongside consideration of availability of local services/third sector providers who offer
2930 support to victims of county lines exploitation.

2931 9.139. Further information on the signs of a child's involvement in county lines is available in guidance published
2932 by the [Home Office and The Children's Society County Lines Toolkit for Professional](#).

2933 Cuckooing

2934 9.140. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation
2935 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to
2936 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to as
2937 cuckooing.

2938 9.141. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to
2939 use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem

2940 in the South of England. The crime is named for the cuckoo's practice of taking over other birds' nests for
2941 its young.

2942 9.142. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms.

2943 9.143. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally
2944 exploited include:

2945

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

2946 children/young people can be missing for days and drug run in other counties

2947

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

2948 phones

2949

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

2950

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

2951

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

2952

- Increase in aggression, violence and fighting

2953

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

2954

- Travel receipts that are unexplained

2955

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

2956 groups

2957

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

2958 wellbeing

2959 9.144. We will treat any child/young person who may be criminally exploited as a victim in the first instance and
2960 refer to the Local Safeguarding Authority in the first instance. If a referral to the police is also required as
2961 crimes have been committed on the school premises, these will also be made.

2962 Knife crime

2963 9.145. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes
2964 references to both; to the use of knives against children either to threaten or to wound them and to
2965 instances when children may have been carrying or using knives for a range of purposes.

2966 9.146. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and
2967 knife-carrying. However, there are many different criminal offences relating to knives. For example:

2968

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

2969

- some bladed weapons are prohibited from being sold or purchased, including to anyone

2970 under the age of 18

2971

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

2972

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

2973

- It is clear that knife crime is an increasing safeguarding risk to children and young people,

2974 both at school and in their local communities. While Ofsted have not sought to answer the

2975 question of the causes of knife crime, leaders told Ofsted that, in their experience, children
2976 are in three categories of risk of knife carrying.

2977 9.147. The highest level of risk is for those children who have been groomed into gangs, for the purposes of
2978 criminal exploitation.

2979 9.148. Underneath this lies a group of children who have witnessed other children carrying knives, have been
2980 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or
2981 who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on
2982 social media.

2983 9.149. Then there are children who carry knives to school as an isolated incident. For example, they may carry
2984 a penknife that a grandparent has gifted them

2985 9.150. It is important to remember that knife crime does not exist in a vacuum and children who are victims or
2986 perpetrators may also be experiencing multiple vulnerabilities.

2987 9.151. Some children and young people can be more at risk of being drawn into criminality; multiple studies
2988 demonstrate a clear link between inequality and high rates of violence for example. There is a need to
2989 both understand and address individual risk factors as well as address the social challenges that underpin
2990 criminal exploitation and serious violence in our communities, from poor mental health, addiction,
2991 poverty, unemployment and poor-quality housing.

2992 **Missing young people and the link between missing and county lines**

2993 9.152. Every precaution is taken through the use of risk assessments and thorough planning and supervision to
2994 ensure that children, young people and young adults are safe both at school, college, home, and on
2995 outings. If a child, young person or young adult goes missing from our Location, it is considered a potential
2996 indicator of abuse or neglect.

2997 9.153. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of
2998 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to attend
2999 school regularly or has been absent without the school's permission for a continuous period of 10 days
3000 or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs
3001 such as travelling to conflict zones, FGM and forced marriage.

3002 9.154. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them
3003 towards going missing and becoming involved in criminal activities. Some individuals may be pulled
3004 towards exploitation through the promise of money, gifts, affection and status. However, they may be
3005 then be forced to work for these people as they are coerced into believing that they are indebted to
3006 them.

3007 **Domestic abuse**

3008 9.155. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever
3009 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as
3010 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of
3011 domestic abuse, based on the previous cross-government definition, ensures that different types of
3012 relationships are captured, including ex-partners and family members. The definition captures a range of
3013 different abusive behaviours, including physical, emotional and economic abuse and coercive and
3014 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the
3015 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as
3016 defined in section 2 of the 2021 Act).

3017 9.156. Types of domestic abuse include intimate partner violence, abuse by family members, teenage
3018 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of

- 3019 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and
3020 domestic abuse can take place inside or outside of the home.
- 3021 9.157. All children can witness and be adversely affected by domestic abuse in the context of their home life
3022 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence
3023 can have a serious, long lasting emotional and psychological impact on children. In some cases, a child
3024 may blame themselves for the abuse or may have had to leave the family home as a result.
- 3025 9.158. Young people can also experience domestic abuse within their own intimate relationships. This form of
3026 abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young
3027 people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or
3028 both parties are under 16). However, as with any child under 18, where there are concerns about safety
3029 or welfare, child safeguarding procedures should be followed and both young victims and young
3030 perpetrators should be offered support.
- 3031 9.159. KCSIE2022 introduces additional information about domestic abuse which can encompass a wide range
3032 of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited
3033 to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They
3034 may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own
3035 intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term
3036 impact on their health, well-being, development, and ability to learn.
- 3037 9.160. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work
3038 together to provide emotional and practical help to children. The system ensures that when police are
3039 called to an incident of domestic abuse, where there are children in the household who have experienced
3040 the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or
3041 children arrive at school the following day. This ensures that the school has up to date relevant
3042 information about the child's circumstances and can enable immediate support to be put in place,
3043 according to the child's needs. Operation Encompass does not replace statutory safeguarding
3044 procedures. Where appropriate, the police and/or schools should make a referral to children's social care
3045 if they are concerned about a child's welfare. More information about the scheme and how schools can
3046 become involved is available on the Operation Encompass website.
- 3047 9.161. Operation Encompass provides an advice and helpline service for all staff members from educational
3048 settings who may be concerned about children who have experienced domestic abuse. The helpline is
3049 available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).
- 3050 9.162. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence,
3051 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well
3052 as those who are worried about friends and loved ones. It also has a form through which a safe time from

3053 the team for a call can be booked. Additional advice on identifying children who are affected by domestic
3054 abuse and how they can be helped is available at:

- 3055 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 3056 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 3057 • [Saflives: young people and domestic abuse.](#)
- 3058 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes
3059 information for adult victims, young people facing abuse in their own relationships and
3060 parents experiencing child to parent violence/abuse)
- 3061 • Home : [Operation Encompass](#) (includes information for schools on the impact of domestic
3062 abuse on children)

3063 **Serious Violent Crime**

3064 9.163. All staff should be aware of indicators, which may signal that children are at risk from, or are involved
3065 with serious violent crime. These may include:

- 3066 • increased absence from school with a significant decline in performance,
- 3067 • a change in friendships or relationships with older individuals or group,
- 3068 • signs of self-harm or a significant change in well-being, or signs of assault or
3069 unexplained injuries,
- 3070 • unexplained gifts or new possessions could also indicate that children have been
3071 approached by, or are involved with individuals associated with criminal networks or
3072 gangs.

3073 9.164. All staff should be aware of the associated risks and understand the measures in place to measure these.
3074 Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang
3075 involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance -](#)
3076 [September 2018.](#)

3077 **Mental Health**

3078 9.165. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing
3079 of young people. All staff should be aware that mental health problems can, in some cases, be an indicator
3080 that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

3081 9.166. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying
3082 possible mental health problems, including routes to escalate and clear referral and accountability
3083 systems.

3084 9.167. The Department is providing funding to support costs of a significant training program for senior mental
3085 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will be
3086 available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school
3087 or college approach to mental health.

3088 9.168. Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem.
3089 Staff however, are well placed to observe children day-to-day and identify those whose behaviour
3090 suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff
3091 suspect this might be the case they should report their concerns to a senior leader within the school and
3092 if possible bring their concerns to a member of the clinical team.

3093 9.169. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood
3094 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is

- 3095 key that staff receive appropriate education and training so that they are aware of how these children's
3096 experiences, can impact on their mental health, behaviour and education.
- 3097 9.170. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action
3098 should be taken. Staff should follow their child protection policy and speak immediately to the DSL or a
3099 deputy.
- 3100 9.171. Schools and colleges can access a range of advice to help them identify children in need of extra mental
3101 health support; this includes working with external agencies. More information can be found in the
3102 [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best
3103 practice. Public Health England has produced a range of resources to support secondary school teachers
3104 to promote positive health, wellbeing and resilience among children.
- 3105 9.172. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful
3106 for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out how schools
3107 and colleges can help prevent mental health problems by promoting resilience as part of an integrated,
3108 whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their
3109 pupils.
- 3110 9.173. In addition, Public Health England has produced a range of resources to support secondary schools to
3111 promote positive health, wellbeing and resilience among children including its guidance Promoting
3112 children and young people's emotional health and wellbeing. Its resources include social media, forming
3113 positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The
3114 Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff
3115 with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our

3116 [Wellbeing for education recovery program](#) content, which covers issues such as bereavement, loss,
3117 anxiety, stress and trauma.

3118 Human trafficking

3119 9.174. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a process
3120 that is a combination of:

- 3121 - Movement (including within the UK);
- 3122 - Control, through harm / threat of harm or fraud
- 3123 - For the purpose of exploitation

3124 9.175. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming
3125 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a
3126 life of abuse, servitude and inhumane treatment.

3127 9.176. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is
3128 significant evidence that children/young people/young adults (both of UK and other citizenship) are being
3129 trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

3130 9.177. There are a number of indicators which suggest that a child/young person/young adult may have been
3131 trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as
3132 follows:

- 3133 - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted
3134 infection or has an unwanted pregnancy
- 3135 - Has a history with missing links and unexplained moves
- 3136 - Is required to earn a minimum amount of money every day
- 3137 - Works in various locations
- 3138 - Has limited freedom of movement
- 3139 - Appears to be missing for periods
- 3140 - Is known to beg for money
- 3141 - Is being cared for by adult/s who are not their parents and the quality of the
3142 relationship between the child and their adult carers is not good
- 3143 - Is one among a number of unrelated children found at one address
- 3144 - Has not been registered with or attended a GP practice
- 3145 - Is excessively afraid of being deported.

3146 9.178. For those children/young people/young adults who are internally trafficked within the UK indicators
3147 include:

- 3148 - Physical symptoms (bruising indicating either physical or sexual assault)
- 3149 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 3150 - Reports from reliable sources suggesting the likelihood of involvement in
- 3151 - Sexual exploitation / the child has been seen in places known to be used for sexual
3152 exploitation
- 3153 - Evidence of drug, alcohol or substance misuse

- 3154 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or
- 3155 borrowing clothing from older people
- 3156 - Relationship with a significantly older partner
- 3157 - Accounts of social activities, expensive clothes, mobile phones or other possessions
- 3158 with no plausible explanation of the source of necessary funding
- 3159 - Persistently missing, staying out overnight or returning late with no plausible
- 3160 explanation
- 3161 - Returning after having been missing, looking well cared for despite having not been
- 3162 at home
- 3163 - Having keys to premises other than those known about
- 3164 - Low self- image, low self-esteem, self-harming behaviour including cutting,
- 3165 overdosing, eating disorder, promiscuity
- 3166 - Truancy / disengagement with education
- 3167 - Entering or leaving vehicles driven by unknown adults
- 3168 - Going missing and being found in areas where the child/young person/young adult
- 3169 has no known links; and/or
- 3170 - Possible inappropriate use of the internet and forming on-line relationships,
- 3171 particularly with adults/other adults.

3172 9.179. These behaviours themselves do not indicate that an Individual is being trafficked, but should be
3173 considered as indicators that this may be the case.

3174 **Child abduction and community safety incidents**

3175 9.180. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal
3176 responsibility for the child. Child abduction can be committed by parents or other family members; by
3177 people known but not related to the victim (such as neighbours, friends and acquaintances); and by
3178 strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst
3179 children and parents, for example, people loitering nearby or unknown adults engaging children in
3180 conversation.

3181 9.181. As children get older and are granted more independence (for example, as they start walking to school
3182 on their own), it is important they are given practical advice on how to keep themselves safe. Many
3183 schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons
3184 focus on building children's confidence and abilities rather than simply warning them about all strangers.
3185 Further information is available at: <http://www.actionagainstabduction.org/> and
3186 <https://clevernevergoes.org/>

3187 **Modern slavery and the National Referral Mechanism**

3188 9.182. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
3189 Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced
3190 criminality and the removal of organs.

3191 9.183. When considering modern slavery, there is a perception that this is taking place overseas. The
3192 government estimates that tens of thousands of slaves are in the UK today.

3193 9.184. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,
3194 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from

3195 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been
3196 rescued within the UK.

3197 9.185. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be
3198 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.

3199 9.186. Further information on the signs that someone may be a victim of modern slavery, the support available
3200 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
3201 Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

3202 Cybercrime

3203 9.187. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised
3204 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line)
3205 or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes
3206 include:

- 3207 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer
3208 network to look for test paper answers or change grades awarded;
- 3209 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,
3210 network or website unavailable by overwhelming it with internet traffic from multiple sources;
3211 and
- 3212 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,
3213 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,
3214 including those above.

3215 9.188. Children with particular skill and interest in computing and technology may inadvertently or deliberately
3216 stray into cyber-dependent crime.

3217 9.189. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the
3218 Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led
3219 by the National Crime Agency, working with regional and local policing. It aims to intervene where young
3220 people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert
3221 them to a more positive use of their skills and interests.

3222 9.190. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of
3223 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line
3224 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](#)

3226 Initiation/Hazing

3227 9.191. Hazing is a form of initiation ceremony, which is used to induct newcomers into an organisation such as
3228 a private school, sports team etc. There are a number of different forms, from relatively mild rituals to
3229 severe and sometimes violent ceremonies in gangs/criminal groups.

3230 9.192. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials, which
3231 promote a bond between them. After the hazing is over, the newcomers also have something in common

3232 with older members of the organisation, because they all experienced it as part of a rite of passage. Many
3233 rituals involve humiliation, embarrassment, abuse, and harassment.

3234 9.193. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour
3235 and raise awareness of such within all services.
3236

3237 **Safeguarding issues relating to Individual children and young people needs**

3238 **Homelessness**

3239 9.194. As an organisation we recognise that being homeless or being at risk of becoming homeless presents a
3240 real risk to a child's/young person welfare. The impact of losing a place of safety and security can affect
3241 an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress
3242 concerns at the earliest opportunity.

3243 9.195. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing
3244 Authority for the parent/guardians in order to raise/progress concerns.

3245 9.196. In most cases school and college, colleagues will be considering homelessness in the context of children
3246 who live with their families, and intervention will be on that basis. However, it should also be recognised
3247 in some cases 16 and 17 year olds could be living independently from their parents or guardians, for
3248 example through their exclusion from the family home, or other reasons. This will require a different level
3249 of intervention and support. Children's services will be the lead agency for these young people and the
3250 DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The
3251 department and the Ministry of Housing, Communities and Local Government have published joint
3252 statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless
3253 and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3254 9.197. Guidance on how local authorities should exercise their homelessness functions in accordance with the
3255 Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local
3256 authorities](#).

3257 9.198. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young
3258 people and the DSL should ensure appropriate referrals are made based on the Individual's
3259 circumstances.

3260 9.199. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be
3261 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding
3262 Authority where an Individual has been harmed or is at risk of harm.

3263 **Private Fostering**

3264 9.200. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be
3265 cared for by another adult who is not closely related and is not a legal guardian with parental
3266 responsibility for 28 days or more.

3267 9.201. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,
3268 uncle or aunt.

3269 9.202. The Law requires that the carers and parents must notify the Children's Services Department of any
3270 private fostering arrangement.

3271 9.203. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is
3272 being privately fostered they will inform the Children's Services Department and inform both the parents
3273 and carers that they have done so.

3274 **Child and the Court System**

3275 9.204. As an organisation we recognise that children/young people are sometimes required to give evidence in
3276 criminal courts, either for crimes committed against them or for crimes, they have witnessed. We know

3277 that this can be a stressful experience and therefore services across the organisation will aim to support
3278 children through this process.

3279 9.205. Along with information, advice and guidance, services will use age-appropriate materials published by
3280 HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it means
3281 to be a witness, how to give evidence and the special measures which are in place to assist such as using
3282 a live link/aids to communicate and video links.

3283 9.206. We recognise that making child arrangements via the family courts following separation can be stressful
3284 and entrench conflict in families. This can be very stressful for children. Services will support
3285 children/young people going through this process.

3286 9.207. Alongside information, advice and guidance services will use online materials published by The Ministry
3287 of Justice (2018) which offers children/young people information & advice on the dispute resolution

3288 service - [Get help with child arrangements](#). These materials will also be offered to parents and carers if
3289 appropriate.

3290 9.208. Ensure that children/young people are sufficiently supported where a parent has been sent to prison;
3291 adequate support includes protection from stigma, isolation and poor mental health.

3292 **Fabricated or induced illnesses (FII)**

3293 9.209. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually
3294 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3295 9.210. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's
3296 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3297 9.211. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This
3298 ranges from extreme neglect (failing to seek medical care) to induced illness.

3299 9.212. Behaviours in FII include a parent/carer who:

- 3300 • persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3301 • exaggerates or lies about their child's symptoms,
- 3302 • manipulates test results to suggest the presence of illness – for example, by putting glucose in urine
- 3303 samples to suggest the child has diabetes,
- 3304 • deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary
- 3305 medication or other substances.

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