

1 Policy and Procedure on

2 Child Protection and Safeguarding – children’s

3 services

4 Bletchley Park School

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Monitoring and review

83 1.1 The Cambian (the Proprietor) will undertake a formal annual review of this policy for the purpose of
84 monitoring and of the efficiency with which the related duties have been discharged, by no later than one

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

87 1.2 The local content of this policy will be subject to continuous monitoring, refinement and audit by the Head
88 of Service.

89 Signed:



Jeremy Wiles

Group Executive Director- Children’s Services

Date: September 2024



Laura Sharman

Headteacher

September 2024

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135 **1. Terminology**

136 1.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as
137 follows:

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'Establishment' or 'Location'	This is a generic term, which means the Children's Home/school/college.
Individual	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Bletchley Park School we have young people attending our school between the ages of 7 and 19 years.
Head of Service	This is the senior person with overall responsibility for the school. At Bletchley Park School this is the Headteacher, Laura Sharman.
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	Means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	This means the worker allocated to the individual's family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Safeguarding Authority	Children's Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] - England
LADO	Local Authority Designated Officer
DSL/DSL Deputy	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
CambianKPI	The online in-house information system, which holds data for each site on quality measures.

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141 **2. Definitions and age-related arrangements**

142 2.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2023) applies
143 to children and young people until they reach the age of 18, Keeping Children Safe in Education (2024)
144 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)
145 Act 2021.

146 2.2. **Adults are over the age of 18.** Over 18-year olds are covered by the Local Safeguarding Adult Boards
147 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse
148 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect; and
149 as a result of their particular care and support needs, is unable to protect themselves from either the risk

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

152 2.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the
153 legal framework for social service provision in Wales. It sets out what must and should be done to
154 safeguard children and adults. At a local level regional safeguarding children's boards co-ordinate and
155 ensure the effectiveness of work to protect and promote the welfare of children.

156 2.4. Staff working with young adults aged 18 and over, who receive education, care and support from our
157 children's services division will follow the Adult safeguarding referral process to LSAB/MASH/Regional
158 Safeguarding Children's Boards depending on local arrangements.

159 2.5. This policy addresses children and young people up to the age of 18 and those over the age of 18 who
160 attend a day or residential school or college – this might be 38- or 52-weeks' provision. Some children
161 attending school or college live in children's homes or care homes across England and Wales, hence the
162 reason why this policy and procedure is more comprehensive than that of a traditional day school or
163 college. Our safeguarding responsibility extends beyond day education and often covers 24hrs services
164 regulated by various regulators across the UK.

165 2.6. Where we make references to schools and colleges, this also includes associated children's or care homes
166 in which children/young people live. Where we make references to children's or care homes, those cover
167 all children's/care homes including those within the children's residential care division.

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

169 2.7. Children's Social Care - provide support to children in need of help and protection, including children with
170 disabilities. Services include statutory assessment and care planning for children at risk of significant
171 harm, provision for cared for children and care experienced young people, as well as fostering and
172 adoption services.

173 2.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governance
174 boards and proprietor should ensure that the school or college contributes to multi-agency working in
175 line with statutory guidance [Working Together to Safeguard Children](#).

176 2.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area
177 within the local authority and the chief officer of police for an area (any part of which falls)) within the
178 local authority work together with appropriate relevant agencies to safeguard and promote the welfare
179 of local children, including identifying and responding to their needs.

180 2.10. It is especially important that schools and colleges understand their role in the three safeguarding partner
181 arrangements. Governance boards, proprietor and their senior leadership teams, especially their DSLs,
182 should make themselves aware of and follow their local arrangements.

183 2.11. The three safeguarding partners should allow all schools and colleges in the local area to be fully engaged,
184 involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding

185 partners will name schools and colleges as relevant agencies and will reach their own conclusions on the
186 best way to achieve the active engagement with individual institutions in a meaningful way.

187 **Child protection definition**

188 2.12. Child protection is part of the safeguarding process. It focuses on protecting individual children identified
189 as suffering or likely to suffer significant harm. This includes child protection procedures, which detail
190 how to respond to concerns about a child.

191 **Safeguarding definition – Working together to safeguarding children 2023**

192 2.13. **Safeguarding children and young people** is the action taken to promote the welfare of children and
193 protect them from harm. It means:

- 194 • Protecting children from abuse and maltreatment,
- 195 • Preventing harm to children’s health or development,
- 196 • Ensuring children grow up with the provision of safe and effective care,
- 197 • Acting to enable all children and young people to have the best outcomes.

198 **Safeguarding definition – Keeping Children Safe in Education 2024**

199 2.14. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes
200 into contact with children and their families has a role to play. In order to fulfil this responsibility
201 effectively, all practitioners should make sure their approach is child-centred. This means that they should
202 consider, at all times, what is in the best interests of the child.

203 2.15. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

209 **Safeguarding Adults**

210 2.16. Safeguarding adults means protecting an adult’s right to live in safety, free from abuse and neglect.
211 It is about people and organisations working together to prevent and stop both the risks and experience of abuse
212 or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where
213 appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

214 2.17. The statutory guidance enshrines the **six principles** of adults safeguarding:
215

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

223 2.18. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and
224 procedures, which apply to its Adults’ Services. Both policies can be accessed via Rezume. Services

225 operating in Wales can find their Safeguarding Regional Boards via this hyperlink, which provides access
226 to local procedures for each Board <https://safeguardingboard.wales/find-your-board/>.

227 **The difference between safeguarding and child protection**

228 2.19. In relation to children's services - in practice safeguarding is the policies and practices that
229 schools/colleges/children's homes employ to keep children safe and promote their well-being. This
230 means everything from security of the buildings, to the safe recruitment of staff and everything in
231 between.

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

233 2.20. In the context of a child/young person, abuse and neglect are forms of maltreatment. Somebody may
234 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm.
235 Children/young people may be abused in a family or in an institutional or community setting, by those
236 known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another
237 child/young person or children/young people.

238 2.21. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of these.

239 2.22. In the context of an adult, abuse is a violation of a person's human and civil rights by another person or
240 persons and may result in significant harm to, or the exploitation of, the person subjected to it.

241 2.23. Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in a
242 care home, school or in a college. It can happen when someone lives alone or with others. Anyone can

243 carry out abuse or neglect. Abuse can be intentional or unintentional; it may be a single act or repeated
244 acts.

245 3. Purpose

246 3.1. As an organisation, we have a clear set of guidelines to make sure we deal with child protection and
247 safeguarding concerns effectively.

248 3.2. This policy is aligned with all relevant legislation and complies with MKSCB, NSCB, Bucks LSCB, HSCP,
249 Central Beds LSCB, Bedfordshire LSCB, Luton SCB and Oxford SCB's locally agreed procedures.

250 3.3. Policies and procedures for child protection and safeguarding must be undertaken in accordance with
251 the requirements of the local authority in which the establishment is situated.

252 3.4. This policy, and supporting information in various accessible forms, is made available to all individuals,
253 staff and parents associated with Cambian Bletchley Park School to ensure that everyone is clear on
254 procedures for ensuring the protection of children and safeguarding children and young adults.

255 3.5. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11.**
256 **Staff Code of Practice and GHR 37. Code of Conduct.**

257 3.6. In addition, staff should be aware of and have access to the **NSPCC whistle-blowing helpline number**
258 **0800 028 0285** and the Cambian Whistleblowing service operated by **EthicsPoint on 0800 086 9128**. More
259 information about EthicsPoint and how it can be contacted can be found in the Whistleblowing policy.

260 3.7. [‘When to call the police’](#) has been produced by the National Police Chiefs Council (NPCC) to support
261 school and college staff with when it is appropriate to contact the police.

262 3.8. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer
263 from harm, it is important that a referral to children's social care (and if appropriate the police) is made
264 immediately. Referrals should follow the local referral process.

265 4. Policy

266 Safeguarding culture of the organisation

267 4.1. Cambian safeguarding culture can be best described as:

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

- 272 children’s and young people’s capacity around the risks and their own safety, regular reflective
273 supervision).
- 274 - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other
275 professionals in timely manner, active listening, applying theory in practice in a methodical
276 way).
- 277 - **Reflective** (understanding ‘how we got there in the first place’, completing a reflective account
278 of events, involving other key professionals in future planning, identifying actions and further
279 changes to be made).
- 280 4.2. Child protection and safeguarding is everyone’s responsibility. Everyone working for or visiting our
281 locations has a responsibility to understand and implement this policy and procedure at all times.
- 282 4.3. All individuals in our services have a right to feel safe, secure and be protected from harm.
- 283 4.4. As a provider of specialist education and care services it is imperative that all staff are aware that all
284 individuals with special educational needs (SEN) and disabilities:
- 285 • Are more likely to be abused or neglected;
 - 286 • May display behaviour, mood and/or injury, which may relate to possible abuse and not just
287 their SEN or a particular disability.
 - 288 • Have a higher risk of peer group isolation.
 - 289 • Can be disproportionately impacted by things like bullying without outwardly showing any signs.
 - 290 • Experience communication barriers and difficulties in overcoming these barriers.
- 291 4.5. The most common reason for children or young people being looked after is as a result of abuse/neglect.
292 We will ensure all staff have the skills, knowledge and understanding to help keep children and young
293 people safe.
- 294 4.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or
295 disclosure that may indicate an individual is at risk of harm, either in the school, college, and care home
296 or in the community, taking into account contextual safeguarding.
- 297 4.7. We have a duty to help individuals learn how to keep themselves safe and deepen their understanding
298 of safeguarding, through both formal curriculum and informal opportunities.
- 299 4.8. As an organisation, we acknowledge that working in partnership with other agencies protects individuals
300 and reduces risk and so we will engage in partnership, working throughout the child protection process
301 to safeguard children and will equally work through safeguarding adults’ procedures as directed by local
302 procedures.
- 303 4.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance
304 referred to in this document can be found in separate appendices at the end of this document.

3. Divisional Safeguarding Board

- 306 4.10. As an organisation Caretech children’s services operates three Divisional Safeguarding Boards: Education,
307 Residential Care and Fostering. The main purpose of each board is to ensure that all services across
308 all divisions discharge their responsibilities effectively for assuring safe and secure services for children
309 and young people, and manage all safeguarding risks appropriately within its own workforce, including
310 direct employees and also the contracted workforce (supply workers/agency/contractor and
311 subcontractors). The full terms of reference for each Board is available on [Cambian Point](#).

3. What staff should read and be aware of

- 313 4.11. On the 1st September 2024 Keeping Children Safe in Education (2024) guidance replaced Keeping Children
314 Safe in Education 2023. It is essential that everybody working in a school or college understands their

- 315 safeguarding responsibilities. Staff who work directly with children read at least [Part one](#) of this guidance.
316 Governance Boards and proprietor (or those acting on their behalf) working with their senior leadership
317 teams and especially their designated safeguarding lead, should ensure that those staff who do not work
318 directly with children read either Part one or [Annex A](#) (a condensed version of Part one) of this guidance.
- 319 4.12. The guidance should be read alongside:
- 320 • statutory guidance - [Working Together to Safeguard Children](#)
 - 321 • departmental advice - [What to do if you are Worried a Child is Being Abused -](#)
322 [Advice for Practitioners](#) ;
- 323 4.13. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how
324 the learning from KCSIE 2024 will take place with their staff. School /college's SLT should ensure that staff
325 complete the KCSIE 2024 knowledge check.
- 326 4.14. All staff should be aware of systems within their school or college, which support safeguarding, and these
327 should be explained to them as part of staff induction. This should include the:
- 328 - Child protection and safeguarding policy
 - 329 - Behaviour Support policy
 - 330 - Anti bullying policy
 - 331 - Whistleblowing policy, Code of conduct and Code of Practice policy
 - 332 - Missing from Care policy, local procedure for children missing from education
 - 333 - Role of the DSL (including the identity of the DSL and any deputies)
 - 334 - Have Access to policies and a copy of Part one of KCSIE2023
 - 335 - All staff should be aware of their local early help process and understand their role in it, more
336 information can be found in Working Together to Safeguard Children 2023
- 337 4.15. All staff should be aware of the process for making referrals to children's social care and for statutory
338 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child
339 suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might
340 be expected to play in such assessments.
- 341 4.16. Schools concerned about a child's/young person's welfare should refer their concern to local authority
342 children's social care where the school is located. If the child is placed at the school by a different LA then
343 the school will need to inform that LA as well. Where a child is suffering, or is likely to suffer from harm,
344 it is important that a referral to children's social care (and if appropriate the police) is made immediately.
345 Referrals should follow the local referral process. Children's homes/care homes should follow their
346 referral process as per their local procedure and contact Safeguarding Partner/Safeguarding Board as per
347 their local Safeguarding procedure.
- 348 4.17. All staff should know what to do if a child/young person/young adult tells them he/she is being abused,
349 exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate
350 level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a
351 deputy) and children's social care. Staff should never promise a child that they would not tell anyone
352 about a report of any form of abuse, as this might ultimately not be in the best interests of the child.
- 353 4.18. All staff should be able to reassure victims that they are being taken seriously and that they will be
354 supported and kept safe. A victim should never be given the impression that they are creating a problem
355 by reporting any form of abuse including sexual violence and sexual harassment. Nor should a victim ever
356 be made to feel ashamed for making a report.
- 357 4.19. It is important to explain that the law is in place to protect children and young people rather than
358 criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- 359 4.20. All staff should be aware that children may not feel ready or know how to tell someone that they are
360 being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For
361 example, children may feel embarrassed, humiliated, or being threatened. This could be due to their
362 vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from
363 having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also

364 important that staff determine how best to build trusted relationships with children and young people
365 which facilitate communication.

366 4.21. Staff should **not** assume a colleague, or another professional will act and share information that might be
367 critical in keeping children safe. They should be mindful that early information sharing is vital for the
368 effective identification, assessment, and allocation of appropriate service provision, whether this is when
369 problems first emerge, or where a child is already known to local authority children's social care (such as
370 a child in need or a child with a protection plan).

371 Whole service approach to safeguarding

372 4.22. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or
373 college approach to safeguarding. This means ensuring safeguarding and child protection are at the
374 forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems,
375 processes and policies should operate with the best interests of the child at their heart.

376 4.23. Where there is a safeguarding concern, the child's wishes and feelings must be considered when
377 determining what action to take and what services to provide. Systems should be in place, and they
378 should be well promoted, easily understood and easily accessible for children to confidently report abuse,
379 knowing their concerns will be treated seriously, and knowing they can safely express their views and
380 give feedback.

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

382 4.24. Children with special educational needs or disabilities (SEND) or certain health conditions can face
383 additional safeguarding challenges. There might be some additional barriers when recognising abuse and
384 neglect in this group of children. These can include:

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

393 4.25. SEN division and other services where children have/may have SEND should consider extra pastoral
394 support and attention for these children, along with ensuring any appropriate support for communication
395 is in place. Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and](#)
396 [Supporting Pupils at School with Medical Conditions](#).

397 Virtual school heads

398 4.26. Virtual school heads manage pupil premium plus for looked after children. In maintained schools and
399 academies, the designated teacher should work with the virtual school head to discuss how funding can
400 be best used to support the progress of looked after children in the school and meet the needs identified
401 in the child's personal education plan. The designated teacher should also work with the virtual school
402 head to promote the educational achievement of previously looked after children. In other schools and
403 colleges, an appropriately trained teacher should take the lead. More information can be found in

404 [Designated teacher for looked after and previously looked after children](#) and [Promoting the education](#)
405 [of looked after and previously looked after children.](#)

406 **5. Procedure**

407 **Roles and responsibilities**

408 5.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and**
409 **visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and
410 abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

411 5.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-contractors,
412 partner organisations and visitors are aware of the policy and are supported to implement and work in
413 accordance with it, as well as creating a management culture that encourages a focus on safeguarding.
414 They must ensure that they are responsive, acting immediately if they become aware of any safeguarding
415 concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

416 5.3. The **Designated Safeguarding Lead (DSL)** is responsible for handling reports and/or concerns, about the
417 protection of children, young people and adults, appropriately and in accordance with the procedures
418 that underpin this policy.
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422 5.4. **Our DSL** is Stephen Doughty who is a senior member of our leadership team. The role of the DSL is to:

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- 424 • Ensure this child protection and safeguarding policy and local arrangements are known, understood
425 and used appropriately by the staff.
- 426 • Act as a source of support, advice and expertise for all staff; provide support to staff to carry out their
427 safeguarding duties.
- 428 • Act as a point of contact with the Safeguarding Authority.
- 429 • Take lead responsibility for referring and managing safeguarding issues and cases, unless
430 management of a particular case is passed on to a more senior member of the organisation – see
431 section of allegations (those meeting harm threshold and those which don't meet LADO criteria).
- 432 • Liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior
433 mental health leads and special educational needs coordinators (SENCOs) or the named person with
434 oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding
435 and welfare (including online and digital safety) and when deciding whether to make a referral by
436 liaising with relevant agencies so that children's needs are considered holistically.
- 437 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,
438 where safeguarding concerns are linked to mental health.
- 439 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child
440 or adult) and, where appropriate, the Local Authority Designated Officer (LADO).
- 441 • Liaise with the headteacher or principal (if they are not the DSL themselves) to inform him or her of
442 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police

- 442 investigations. This should include being aware of the requirement for children to have an Appropriate
443 Adult. Further information can be found in the statutory guidance - [PACE Code C 2019](#).
- 444 • As required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for
445 child protection concerns in cases which concern a staff member.
 - 446 • Refer cases to the Channel programme where there is a radicalisation concern as required.
 - 447 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the
448 Disclosure and Barring Service as required; and
 - 449 • Refer cases where a crime may have been committed to the police as required. [NPCC - When to call](#)
450 [the police](#) should help understand when to consider calling the police and what to expect when
451 working with the police.
 - 452 • Act as a source of advice, support and expertise within the location when deciding to make a referral
453 by liaising with relevant agencies.
 - 454 • Help promote educational outcomes by sharing the information about the welfare, safeguarding and
455 child protection issues that children are experiencing, or have experienced, with teachers and school
456 and college leadership staff.
 - 457 • Identify staff safeguarding training needs and organise training for their staff.
 - 458 • Participate in local safeguarding boards when required.
 - 459 • Evaluate and contribute to high standards of safeguarding practice at the location.
 - 460 • Work to ensure that the wellbeing of children and young people is in constant focus and that they are
461 guarded from harm or abuse.
 - 462 • Ensure the child protection and safeguarding policy is available publicly and parents/those with
463 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be
464 made and the role of the school/college/home in this.
 - 465 • Understands the relevant data protection legislation and regulations, especially The Data Protection
466 Act 2018.
- 467 5.5. More details about the role of the DSL including their availability, management of referrals, information
468 sharing, working with others, raising awareness and other can be found in [KCSIE 2023 Annex C - Role of](#)
469 [the DSL](#)
- 470 5.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where
471 asked do to so. There are arrangements for covering the role of the DSL when Stephen Doughty is
472 unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team
473 lead by a DSL with a number of deputies where required. Our Designated Deputy is Carey Chandler.
474
475
- 476 5.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected
477 abuse and neglect should be given the highest priority.
- 478 5.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and**
479 **Safeguarding at Cambian**.
- 480 5.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps
481 to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff
482 must use the correct forms when recording and managing concerns and allegations regarding the abuse
483 of individuals. Education services must use Behaviour Watch or My Concern systems:
484 Concern/Safeguarding function to record concerns. Where, throughout this policy, references are made
485 to the ‘concern form’ this means either **25.04 Concern form** which is a word document (part of this policy)
486 or the Behaviour Watch/My Concern– Concern/Safeguarding functionality where the system is being
487 used.

488 **Information sharing and managing the child protection file**

- 489 5.10. **The DSL** is responsible for ensuring that child protection files are kept up to date. Information should be
490 kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child

491 protection file for each child. Schools and colleges should use the Behaviour Watch/My Concern system
492 - Concern/Safeguarding function to record all concerns and to generate Safeguarding Tracking Packs per
493 child/young person as necessary.

494 5.11. Records should include:

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

498 5.12. They should ensure the file is only accessed by those who need to see it and where the file or content
499 within it is shared, this happens in line with information sharing advice as set out in KCSIE 2024 and
500 [Information sharing advice for safeguarding practitioners](#).

501 5.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for**
502 **each pupil or student**. This goes beyond the legal minimum. It is good practice to give the school or
503 college additional options to contact a responsible adult when a child missing education is also identified
504 as a welfare and/or safeguarding concern.

5.14 LADO referral criteria (KCSIE 2024) – meeting the harm threshold

506 5.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if they
507 continue to work in regular or close contact with children in their present position, or in any capacity with
508 children in a school or college. This guidance should be followed where it is alleged that anyone working
509 in the school or college that provides education for children under 18 years of age, including supply
510 teachers, volunteers and contractors has:

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

517 5.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of the](#)
518 [Children Act 1989 as amended by the Adoption and Children Act 2002](#).

519 5.16. The last bullet point above includes behaviour that may have happened outside of school or college that
520 might make an individual unsuitable to work with children; this is known as transferable risk. Where
521 appropriate an assessment of transferable risk to children with whom the person works should be
522 undertaken. If in doubt, seek advice from the local authority designated officer (LADO).

523 5.17. This above information relates to members of staff, supply staff and volunteers who are currently working
524 in any school or college regardless of whether the school or college is where the alleged abuse took place.

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

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

528 5.18. Many children and young people in our services (education and care) have an allocated social worker due
529 to safeguarding or welfare needs.

530 5.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's
531 experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally
532 disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

533 5.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this
534 information so that decisions can be made in the best interests of the child's safety, welfare and
535 educational outcomes. This should be considered as a matter of routine. There are clear powers to share
536 this information under existing duties on both local authorities and schools and colleges to safeguard and
537 promote the welfare of children.

538 5.21. Where children need a social worker, this should inform decisions about safeguarding (for example,
539 responding to unauthorised absence or missing education where there are known safeguarding risks) and
540 about promoting welfare (for example, considering the provision of pastoral and/or academic support,
541 alongside action by statutory services). Schools/colleges must follow missing from education protocol
542 agreed with their LA.

543 5.22. Children missing from education, particularly persistently, can act as a vital warning sign to a range of
544 safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county
545 lines. It is important the school or college's response to children missing from education supports
546 identifying such abuse and helps prevent the risk of them going missing in the future. More information
547 can be found in KCSIE 2024.

548 **Unexplained body marks**

549 5.23. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,
550 swellings, cuts and scratches which by and large will be as a result of daily activities or for some individuals
551 as a result of self-injurious behaviour. A concern form must be completed for all unexplained marks and
552 physical changes and passed to the DSL (or a deputy) along with copies of the last 3 days of Daily Diary
553 notes and Activity Records. Parents/carers and social workers should always be kept informed. Concern
554 log should be updated with concern and relevant reference number provided to concern.

555 5.24. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the
556 correct course of action for dealing with unexplained body marks.

557 5.25. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no
558 reasonable explanation can be given the DSL must contact the local Safeguarding Authority for further
559 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

560 5.26. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be
561 opened and safeguarding process followed.

562 5.27. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome
563 must be shared with social worker and parents.

564 **Disclosure from an Individual**

565 5.28. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
566 **procedure.**

567 5.29. It is important to note that children/young people may not find it easy to tell staff about their abuse
568 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react
569 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a
570 member of school or college staff may overhear a conversation that suggests a child has been harmed or
571 a child's/young person's own behaviour might indicate that something is wrong. If staff have any

- 572 concerns about a child's/young person's welfare, they should act on them immediately rather than wait
573 to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**
574 **procedure.**
- 575 5.30. In case of reports of sexual violence and sexual harassment between children and young people, these
576 are extremely complex to manage. It is essential that victims are protected, offered appropriate support
577 and every effort is made to ensure their education and care is not disrupted. It is also important that
578 other children, young people and staff are supported and protected as appropriate.
- 579 5.31. The service's initial response to a report from a child is incredibly important. How the staff respond to a
580 report can encourage or undermine the confidence of future victims of sexual violence and sexual
581 harassment to report or come forward.
- 582 5.32. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.
583 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage
584 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding
585 Authority) to discuss next steps. Staff should only share the report with those people who are necessary
586 in order to progress it. It is important that the victim understands what the next steps will be and whom
587 the report will be passed to.
- 588 5.33. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and how
589 the report will be progressed, don't ask leading questions and only prompt the child where necessary
590 with open questions – where, when, what, etc. It is important to note that whilst leading questions should
591 be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- 592 5.34. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or
593 college staff. It is important that the person to whom the child discloses recognises that the child has
594 placed them in a position of trust. They should be supportive and respectful of the child.
- 595 5.35. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the report
596 and immediately write up a thorough summary. This allows the staff member to devote their full
597 attention to the child and to listen to what they are saying. It may be appropriate to make notes during
598 the report (especially if a second member of staff is present). However, if making notes, staff should be
599 conscious of the need to remain engaged with the child and not appear distracted by the note taking.
600 Either way, it is essential a written record is made using Concern form which is part of this policy. The
601 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report
602 to the DSL must be completed within an hour from the moment of the disclosure being made.
- 603 5.36. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of
604 the note taker. Staff should be aware that notes of such reports could become part of a statutory
605 assessment by Safeguarding Authority and/or part of a criminal investigation.
- 606 5.37. In cases where either a child/young person informs the staff that an act of FGM – however described –
607 has been carried out on her, or where the staff observes physical signs on a girl appearing to show that
608 an act of FGM has been carried out these situations, the police must be informed. The DSL should also be
609 informed who will trigger child protection/safeguarding procedures described in this policy. If a
610 child/young person is at immediate risk – the Police (999) must be contacted immediately. If a

- 611 child/young person required medical attention, follow steps identified in 'Setting priorities' section
612 below.
- 613 5.38. Remember, **do not**:
- 614 • Investigate the incident
 - 615 • Ask leading questions
 - 616 • Get the young person to repeat the disclosure over and over
 - 617 • Make assumptions or offer alternative explanations
 - 618 • Approach/inform the alleged abuser
 - 619
- 620 5.39. All staff know that they can contact the Local Authority direct should that be necessary. Where a
621 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding
622 Adult Board. Where someone is over 18 but still receiving children's services, the matter should be dealt
623 with by the local Safeguarding Adult Board.
- 624 5.40. For allegation made against a staff member or senior managers/directors follow relevant allegations
625 procedures described later on in this policy.
- 626 5.41. Where contact is made with the Local Authority in which Cambian Bletchley Park School is geographically
627 located, contact will also be made with the individual's own Local Authority and also the child/young
628 person's social worker. This will be completed by one of the members of the school safeguarding team.
- 629 5.42. In the case of serious harm, and/or the individual is in immediate danger the local police should be
630 informed immediately and they can take immediate protective action as necessary.
- 631 5.43. If a member of staff feels their concerns are not being taken seriously then they are to inform a more
632 senior manager, a Director of the Company or contact Ofsted, the local safeguarding boards, the police
633 or the **Whistleblowing Hotline – on 0800 086 9128**.

6 Risk Assessment

- 635 5.44. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk
636 and needs assessment. Where there has been a report of sexual harassment, the need for a risk
637 assessment should be considered on a case-by-case basis. The risk and needs assessment should
638 consider:
- 639 • the victim, especially their protection and support,
 - 640 • whether there may have been other victims,
 - 641 • the alleged perpetrator(s); and
 - 642 • all the other children, (and, if appropriate, adult students and staff) at the school or college
643 especially, and any actions that are appropriate to protect them from the alleged
644 perpetrator(s), or from future harms.
 - 645 • The time and location of the incident, and any action required to make the location safer.
- 646 5.45. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times,
647 staff should be actively considering the risks posed to all their pupils and students and put adequate
648 measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure they are
649 engaging with Safeguarding Authority and specialist services as required. Where there has been a report
650 of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence
651 specialists will be required. The above school or college risk assessment is not intended to replace the
652 detailed assessments of expert professionals. Any such professional assessments should be used to

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

655 Following a report - what to consider

656 5.46. Important considerations will include:

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

680 5.47. As always when concerned about the welfare of a child, all staff should act in the best interests of the
681 child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout
682 this guidance. Immediate consideration should be given as to how best to support and protect the victim
683 and the alleged perpetrator(s) (and any other children involved/impacted).

684 Options to manage the report

685 5.48. It is important that schools and colleges consider every report on a case-by-case basis. When to inform
686 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going
687 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school or college
688 should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be
689 informed of the allegations. However, as per general safeguarding principles, this does not and should
690 not stop the school or college taking immediate action to safeguard their children, where required.

691 5.49. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual
692 violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are
693 regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly
694 important to look out for potential patterns of concerning, problematic or inappropriate behaviour.
695 Where a pattern is identified, the school or college should decide on a course of action. Consideration
696 should be given as to whether there are wider cultural issues within the school or college that enabled

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

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

704 • **Early help:** In line with the above, the school or college may decide that the children
705 involved do not require referral to statutory services but may benefit from early help. Early
706 help means providing support as soon as a problem emerges, at any point in a child's life.
707 Providing early help is more effective in promoting the welfare of children than reacting
708 later. Early help can be particularly useful to address non-violent harmful sexual behaviour
709 and may prevent escalation of sexual violence. It is particularly important that the DSL (and
710 their deputies) know what the Early Help process is and how and where to access support.

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

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

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

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

727 5.50. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider
728 whether the child and/or the person who has made the allegation needs help or may have been abused
729 by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding authority may
730 be appropriate.

731 5.51. If a report is shown to be deliberately invented or malicious, the school or college should consider
732 whether any disciplinary action is appropriate against the individual who made it as per their own
733 behaviour policy.

734 **Safeguarding and supporting the victim**

735 5.52. The needs and wishes of the victim should be paramount (along with protecting the child)/young person
736 in any response. It is important they feel in as much control of the process as is reasonably possible.
737 Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall,
738 the priority should be to make the victim's daily experience as normal as possible, so that the school or
739 college is a safe space for them.

740 5.53. Consider the age and the developmental stage of the victim, the nature of the allegations and the
741 potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual

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

744 5.54. The victim should never be made to feel that they are the problem for making a report or made to feel
745 ashamed for making a report. This has been made clear throughout this policy and procedure.

746 5.55. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The
747 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different
748 from that for a report of rape.

749 5.56. Services should be aware that sexual assault can result in a range of health needs, including physical,
750 mental, and sexual health problems and unwanted pregnancy. Children and young people that have a
751 health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault
752 Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors
753 of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children
754 and adults, regardless of when the incident occurred.

755 5.57. Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and
756 practical support for victims of sexual violence. They are based within the specialist sexual violence sector
757 and will help the victim understand what their options are and how the criminal justice process works if
758 they have reported or are considering reporting to the police. ChISVAs will work in partnership with
759 schools and colleges to ensure the best possible outcomes for the victim.

760 Safeguarding and supporting the alleged perpetrator(s)

761 5.58. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice:
762 [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles
763 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding
764 and supporting the alleged perpetrator(s):

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

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

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

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

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

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

787 **Setting priorities**

788 5.59. The priority, at all stages throughout the child protection or safeguarding process, is the interests and
789 safety of the individual.

790 5.60. Where appropriate, any concerns will be discussed with the individual's family / carers and where
791 possible their agreement will be sought to making a referral to the Local Authority. However, where
792 there is a conflict of interests between the Individual and parent/guardian, the interests of the individual
793 must take priority and Cambian Bletchley Park School has the right to contact the individual's local
794 authority, social care or the police, without notifying parents/carers if this is in their best interests.

795 5.61. If an urgent medical, attention or advice is required and GP/specialist doctor is not available, staff MUST
796 use the NHS **111** service. NHS **111** is available 24 hours a day, 7 days a week.

797 5.62. If the situation is life-threatening, staff must call 999 immediately and ask for an ambulance. Alternatively,
798 if it is assessed to be in the best interest of the child/young person - the DSL MUST take the Individual to
799 the Accident and Emergency Unit at the nearest hospital, having first notified the Local Authority/Police,
800 remembering that every reasonable effort should be made to inform the parents/carers as soon as
801 possible.

802 5.63. If the suspected abuse is sexual, then the medical professional must determine if the medical examination
803 should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility
804 that the needs of the young person are such that medical attention is the priority, in such case medical
805 professional's judgment must be followed. There must at all times be an appropriate adult (parent,
806 guardian or a social worker) with the individual whether from the individual's care home/school/college,
807 the Local Authority or the Police, if the parents/carers are not included. This section must be read in
808 conjunction with our **0.29. Child Sexual Exploitation policy**.

809 5.64. Cambian will provide an advocate to each individual where appropriate, if they are unable to speak for
810 themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to the Mental
811 Capacity Act. Further information on MCA are available in our **0.13. Mental Capacity and Consent policy**.

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

813 5.65. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for
814 dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual
815 is suffering or likely to suffer significant harm'. DSL must refer individual-on-individual abuse including
816 child on child/young adult on young adult or between individuals of a different age or other to a
817 Safeguarding Authority, local authority and regulator.

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

819 5.66. If we were given information that suggested that someone who does not reside at or attends our location
820 has been abused by one of our members of staff, the DSL would immediately report this to the Local
821 Authority and LADO. The Head of Service must be kept informed and HR Business Partner consulted.
822 Should the staff member be involved we would then formally advise the member of staff of the allegation,
823 making it clear that we would not play any part in the investigatory process. The employee would be
824 advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived
825 risks) etc., in exactly the same way as if the allegation had involved an Individual at our school. However,
826 the HR Business Partner must be consulted before any action is taken. If the allegation were subsequently
827 proved to be unfounded, he or she would be given full support in resuming their career. Should we be
828 asked by LADO/Safeguarding authority to be involved in any potential investigations or parts of it, an HR

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

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

832 5.67. If we were given information that suggested that someone who does not reside at or attends our location
833 has been abused by a third party (known or unknown to the provision), the DSL would immediately report
834 this to the Local Authority and Police. The Head of Service must be kept informed. DSL will follow advice
835 provided by the leading agency and report back to the Head of Service who will explore any associated
836 risk/s in relation to the provision.

8 Allegations against staff

838 5.68. All allegations must be reported to the DSL Stephen Doughty or in their absence to a DSL Deputy – see
839 your local Safeguarding poster. In addition, where appropriate - HR Business Partner must be consulted.

840 5.69. When an allegation is made against a member of staff, set procedures must be followed, see the flow
841 chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.

842 5.70. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully assessed
843 and investigated. Staff who are the subject of an allegation have the right to have their case dealt with
844 fairly, quickly and consistently and to be kept informed of its progress.

845 5.71. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided
846 for what to do in the event an allegation is made against them.

8 Allegations against staff in Education

848 5.72. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors.
849 The allegations are split into two groups:

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

854 5.73. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they
855 continue to work in regular or close contact with children in their present position, or in any capacity with
856 children in a school or college.

857 5.74. The information above relate to members of staff, supply staff, volunteers and contractors who are
858 currently working in any school or college regardless of whether the school or college is where the alleged
859 abuse took place. It is advised that in Education allegations against people listed above should be referred
860 to the Head/Principal who is often the DSL, however where the Head/Principal is not the DSL, allegations
861 against staff including supply, volunteers and contractors must be referred to the Head/Principal who
862 may liaise with the DSL. This is because the concern/allegation may align with other performance or
863 personal related issues the Head/Principal might already be aware of, whereas the DSL may not be. The
864 Principal/Head should ensure the DSL is briefed as appropriate and will then decide whom the case should
865 be led by – the DSL or themselves. Allegations against a teacher who is no longer teaching should be
866 referred **to the police** and HR Business Partner advised.

867 5.75. Where an adult makes an allegation to a school or college that they were abused as a child, the individual
868 should be advised to report the allegation to the police. Non-recent allegations made by a child, should
869 be reported to the LADO in line with the local authority’s procedures for dealing with non-recent
870 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no
871 matter how long ago it happened.

872 5.76. Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher
873 because of serious misconduct, or might have dismissed them or ceased to use their services had they
874 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching

875 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found
876 on GOV.UK.
877

878 Allegations against supply teachers and all workers supplied by agency

879 5.77. In some circumstances schools and colleges will have to consider an allegation against an individual not
880 directly employed by them, where its disciplinary procedures do not fully apply because agencies will
881 have their own policies and procedures; for example, supply teachers or contracted staff provided by an
882 employment agency or business.

883 5.78. Whilst the organisation's schools and colleges are not the employer of supply teachers, they should
884 ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease
885 to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the
886 LADO to determine a suitable outcome. Schools and colleges must also consult the HR Business Partner
887 who may advise further. Governance boards and proprietors should discuss with the supply agency or
888 agencies where the supply teacher is working across a number of schools or colleges, whether it is
889 appropriate to suspend the supply teacher, or redeploy them to another part of the school or college,
890 whilst they carry out their investigation.

891 5.79. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or
892 children's social care. The school or college will usually take the lead because agencies do not have direct
893 access to children or other school or college staff, so they will not be able to collect the facts when an
894 allegation is made, nor do they have all the relevant information required by the LADO as part of the
895 referral process.

896 5.80. When using a supply agency, schools and colleges should inform the agency of its process for managing
897 allegations but also take account of the agency's policies and investigatory process and their duty to refer
898 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or
899 equivalent to meetings and keeping them up to date with information about its policies. It is important
900 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be
901 consulted.
902

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

904 5.81. All allegations must be reported to:

905 - Education division: Regional Education Lead James Imber. For the DSL fulfilling the role as
906 their substantive role, all allegations must be reported to the Headteacher.

907 5.82. Depending on the division and who is the service DSL, people notified of allegation made (see above) will
908 then refer the matter to LADO and notify their line manager:

909 - Education division: Regional Education Lead James Imber or

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

912 5.83. The person who referred the matter to local LADO in line with agreed course of action will decide about
913 who will lead the case including management investigation – should the allegation threshold be met. The
914 appropriate HR Business Partner should be notified, so they can advise and where required - support the
915 investigation.

916 Allegations against the Regional Manager/other Regional staff

917 5.84. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Headteacher)
918 who will make the initial referral to LADO. Following this, the allegation should be passed to the identified
919 senior person to follow through with LADO and subsequently act in line with agreed course of action. This
920 means that the DSL will retain the responsibility to report the initial concern, but will have no further part

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

923 5.85. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to
924 LADO and act in line with agreed course of action.

925 5.86. The appropriate HR Business Partner should be notified, so they can advise and where required - support
926 the investigation.

9 Allegations against the Operations Directors or Managing Director

928 5.87. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
929 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
930 to the identified senior person to follow through with LADO and subsequently act in line with agreed
931 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
932 will have no further part in the process regarding gathering any information or, should it be required, in
933 the actual investigation in relation to a senior member.

934 5.88. Allegations not linked to specific site must be reported to Managing Director for Education who will refer
935 the matter to LADO and act in line with agreed course of action.

936 5.89. The Head of HR should be notified, so they can advise and where required - support the investigation.

9 Allegations against any other Senior Leader

938 5.90. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
939 Head/Principal) who will make the initial referral to LADO Following this, the allegation should be passed
940 to the identified senior person to follow through with LADO and subsequently act in line with agreed
941 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
942 will have no further part in the process regarding gathering any information or, should it be required, in
943 the actual investigation in relation to a senior member.

944 5.91. Allegations not linked to specific site must be reported to the person's (whom allegation is made against)
945 line manager who will refer the matter to LADO and act in line with agreed course of action.

946 5.92. 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

948 5.93. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
949 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
950 to the identified senior person to follow through with LADO and subsequently act in line with agreed
951 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
952 will have no further part in the process regarding gathering any information or, should it be required, in
953 the actual investigation in relation to a senior member.

954 5.94. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
955 Amanda Sherlock who will refer the matter to LADO and act in line with agreed course of action.

956 5.95. The Head of HR should be notified, so they can advise and where required - support the investigation.

9 Allegations against the Chief Executive Officer

958 5.96. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
959 Head/Principal) who will make the initial referral to LADO Following this, the allegation should be passed
960 to the identified senior person to follow through with LADO and subsequently act in line with agreed
961 course of action. This means that the DSL will retain the responsibility to report the initial concern, but

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

964 5.97. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
965 Amanda Sherlock who will refer the matter to LADO and act in line with agreed course of action.

966 5.98. The Head of HR should be notified, so they can advise and where required - support the investigation.

9 Allegations - The initial response

968 5.99. Where the school or college identifies a child/young person has been harmed, that there may be an
969 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact
970 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are
971 two aspects to consider when an allegation is made:

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

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

978 5.100. When dealing with allegations, schools and colleges should:

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

982 5.101. Schools and colleges should ensure they understand the local authority arrangements for managing
983 allegations, including the contact details and what information the LADO will require when an allegation
984 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with
985 local procedures to establish the facts to help them determine whether there is any foundation to the
986 allegation, being careful not to jeopardise any future police investigation. For example:

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

991 5.102. These are just a sample of example questions. Services should be familiar with what initial information
992 the LADO will require. This information can be found in local policy and procedural guidance provided by
993 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared
994 with the HR department to support any investigation.

995 5.103. When to inform the individual of the allegation should be considered carefully on a case-by-case basis,
996 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

997 5.104. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion
998 involving the police and/or children’s social care will be convened in accordance with the statutory
999 guidance [Working Together to Safeguard Children](#).

1000 5.105. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the
1001 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps
1002 with the case manager (A ‘case manager’ will be the person leading any investigation. In most cases this
1003 will be a senior leader from outside the school/home). The LADO should be informed who will lead the

1004 investigation to ensure there is no conflict of interest or any other concerns related to the choice of the
1005 case manager.

1006 **No Further Action**

1007 5.106. Where the initial discussion initial discussion leads to no further action, the case manager and the LADO
1008 should:

- 1009
- record the decision and justification for it; and,
- 1010
- agree on what information should be put in writing to the individual concerned and by
1011 whom.

1012 **Further enquiries**

1013 5.107. Where further enquiries are required to enable a decision about how to proceed, the LADO and case
1014 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases,
1015 the investigation should normally be undertaken by a senior member of the school's or college's staff.

1016 5.108. Where there is a lack of appropriate resource within the school or college, or the nature or complexity
1017 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional
1018 Lead (Education or Care), a Director, HR Business Partner or an independent investigator if appropriate.

1019 5.109. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as
1020 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals,
1021 depending on the complexity of the case.

1022 5.110. Wherever possible, the first review should take place no later than four weeks after the initial
1023 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review
1024 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges
1025 when considering allegations against adults working with children. The LADO's role is not to investigate
1026 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police,
1027 children's social care, the school or college, or a combination of these.

1028 **Suspension**

1029 5.111. Suspension should not be an automatic response when an allegation is reported. All options to avoid
1030 suspension should be considered prior to taking that step. The case manager must consider carefully
1031 whether the circumstances warrant suspension from contact with children at the school or college, or
1032 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a
1033 child or other children at the school or college is/are at risk of harm, or the allegation could be considered
1034 as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR
1035 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have been
1036 involved. More information on suspension and associated process can be found in KCSIE 2024

1037 **Supporting those involved**

1038 5.112. The welfare of a child/young person is paramount) and this will be the prime concern in terms of
1039 investigating an allegation against a person in a position of trust. However, when an allegation or
1040 safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject
1041 of the investigation, and potentially for the family members. It is important that an employer offers
1042 appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is
1043 confidential and should not ordinarily be shared with the other staff or with children or parents who are

1044 not directly involved in the investigation. More about employer's duty of care to their employees can be
1045 found in the KCSIE2023 guidance.

1046 5.113. Staff whom allegation/s have been made against must always be supported and if suspended they will
1047 receive a support person (nominated contact), any suspension is not an indication of guilt.

1048 Allegation outcomes

1049 5.114. The definitions that should be used when schools and colleges determine the outcome of an allegation
1050 are set out below:

- 1051 • Substantiated: there is sufficient evidence to prove the allegation;
- 1052 • Malicious: there is sufficient evidence to disprove the allegation and there has been a
1053 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1054 • False: there is sufficient evidence to disprove the allegation;
- 1055 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.
1056 The term, therefore, does not imply guilt or innocence; or
- 1057 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the
1058 allegation being made.

1059 5.115. It should be noted that these definitions are available to support the decision-making process. However,
1060 in certain cases, in the absence of any substantiating evidence, the Company may still progress through

1061 the formal disciplinary procedure if there are reasonable grounds to do so, or there is a reasonable belief
1062 that an employee has committed an act of misconduct.

1063 5.116. Ultimately, the options open to the school or college depend on the nature and circumstances of the
1064 allegations and the evidence and information available. This will range from taking no further action, to
1065 dismissal or a decision not to use the person's services in future.

1066 **Serious incident reporting**

1067 5.117. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported
1068 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

1069 **Death of someone in our care including rapid response to unexpected death**

1070 5.118. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
1071 rapid response, process described below:

- 1072 • Call the Ambulance and Police
- 1073 • Unless the 999 operator tells you to, do not touch the person; do not move anything
1074 around them, which may form part of forensic evidence. Police will decide about the
1075 forensic examinations and appropriate security of the scene.
- 1076 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI)
1077 reporting procedure. The DSL will contact the Managing Director of the division they work
1078 in and verbally inform them of what happened before completing SUI Part 2.
- 1079 • DSL will contact Children's/Adults Social Care Team
- 1080 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health
1081 Services (CAMHS) should also be notified by the Safeguarding Authority.

1082 5.119. Once the above rapid steps have been taken, further steps described below must be followed.

1083 5.120. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the
1084 following within 24 hours:

- 1085 • Group Executive Director Managing Director, Responsible/Nominated Individual, Regional
1086 Lead following the **35.01. Caretech Children's services SUI process.**
- 1087 • Next of kin/parents/carer of the deceased.
- 1088 • Where the death of an individual occurs in an education location the assistance of the
1089 local police and social services department should be sought in informing the
1090 parents/guardians.
- 1091 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn
- 1092 • Ministry of Justice if applicable.
- 1093 • The placing authority/authorities.
- 1094 • The local authority responsible for Social Services and Education (where the death takes
1095 place in a registered school) within whose area the education location is situated.
- 1096 • The District Health Authority within whose area the education location is situated.
- 1097 • The Department for Education, (where the death takes place in a registered school).
- 1098 • The Health and Safety Executive.

1099 **Abuse of position of trust**

1100 5.121. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,
1101 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the
1102 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a
1103 position of trust, even if the relationship is consensual. This means that any sexual activity between a

1104 member of the staff and a young person under 18 may be a criminal offence, even if that young person
1105 is over the age of consent.

11 **Visitors**

1107 5.122. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.
1108 All unauthorised visitors will be challenged by staff and reported to the home
1109 manager/headteacher/principal before entry is authorised.

11 **Volunteers**

1111 5.123. Volunteers undergo checks commensurate with their work in the home/school/college and contact with
1112 children, young people and adults i.e. if they are in regulated activity or not.

11 **Contractors**

1114 5.124. We will check the identity of all contractors working on site and request the full range of DBS and other
1115 required checks where they work in regulated activity or unsupervised in accordance with the latest
1116 government guidance.

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

1118 5.125. Where governance boards or proprietor hire or rent out school or college facilities/premises to
1119 organisations or individuals (for example to community groups, sports associations, and service providers
1120 to run community or extra-curricular activities) they should ensure that appropriate arrangements are in
1121 place to keep children safe.

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

1123 5.126. Where extended off-site activities are provided by and managed by us, our safeguarding policy and
1124 procedures apply. If other organisations provide services or activities on our site we will check that they
1125 have appropriate policies and procedures in place, including safer recruitment procedures and clarify
1126 whose procedure is to be followed if there are concerns. There will be clear communication channels to
1127 ensure the DSL is kept appropriately informed.

1128 5.127. When our Individuals are doing off-site activities, including day and residential visits and work-related
1129 activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL
1130 will be kept appropriately informed.

11 **Use of mobile phones**

1132 5.128. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media
1133 access including **Pro 01. Mobile Telephony Policy** at all times.

1134 5.129. All computer equipment and internet access within the home/school/college is subject to 'parental
1135 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social
1136 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons
1137 during working hours. Staff need to help our Individuals to prepare for the dangers of the internet and

1138 social media whilst promoting the many learning and social opportunities available through the internet
1139 and social media.

1140 5.130. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST
1141 neither mention Bletchley Park School or refer to their employment at the school. Staff are advised not
1142 to communicate with parents, guardians, carers or Individuals via social networking sites

1143 **Photography and images**

1144 5.131. This section should be read in conjunction to our **GIG 02. Data Protection policy.**

1145 5.132. The vast majority of people who take or view photographs or videos of individuals do so for entirely
1146 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through
1147 taking or using images, so we have some safeguards in place.

1148 5.133. To protect our children, young people or young adults we will:

- 1149 • seek their consent for photographs to be taken or published (for example, on our website
1150 or in newspapers or publications)
- 1151 • seek parental consent of consent from the Individual
- 1152 • not use their full name with an image, only their initials
- 1153 • ensure that personal data is not shared
- 1154 • store images appropriately, securely and for no longer than necessary
- 1155 • only use school equipment, i.e. not personal devices
- 1156 • encourage our children, young people and adults to tell us if they are worried about any
1157 photographs that are taken of them

1158 **Physical intervention and use of reasonable force**

1159 5.134. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are
1160 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**
1161 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,
1162 recorded and monitored.

1163 **Staff taking medication or other substances**

1164 5.135. Staff members must not be under the influence of alcohol or any other substance, which may affect their
1165 ability to care for the individuals. If they are taking medication, they should seek medical advice and
1166 inform the Home Manager/Headteacher/Principal who will review the medical advice and take a decision
1167 as to whether they are fit for work.

1168 5.136. We only allow staff to work if medical advice confirms that their ability to look after individuals is unlikely
1169 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it
1170 must be securely stored and out of reach of all children, young people and young adults. This section
1171 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy.**

1172 **Information for individuals and relatives/carers**

1173 5.137. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt
1174 with independently and that they will be kept involved in the process to the degree that they wish to be.
1175 They will be reassured that they will receive help and support in taking action.

1176 5.138. They will also be advised that they can nominate an advocate or representative to speak and act on their
1177 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could
1178 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be
1179 appointed. They will be advised of rights to legal aid in where appropriate to victim support and
1180 compensation.

1181 **Recruitment and vetting**

1182 5.139. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**
1183 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1184 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting
1185 schools should read Part 3 of KCSIE2023 guidance dedicated to Safer Recruitment.

1186 5.140. Each education location maintains a **Single Central Record (SCR)**. This covers all staff including supply
1187 teaching and teacher trainees, agency care staff as well as multisite managers and members of the
1188 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1189 5.141. For agency workers we obtain written confirmation that all checks have been completed, in line with
1190 safer recruitment from the employment business that is supplying the member of agency staff. All
1191 Locations must ensure that an agreement exists between the Location and the agency to confirm that, in
1192 the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate
1193 before that person can begin work at the home/school/college.

1194 5.142. All locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the
1195 agency.

1196 5.143. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the
1197 same recruitment regulations and procedures as the education staff.

1198 Requirements to inform Disclosure and Barring Services (DBS)

1199 5.144. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the
1200 barred lists is required.

1201 5.145. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one
1202 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to
1203 safeguarding concerns, or would have been had they not resigned.

1204 5.146. In the case of a member of teaching staff at a school or sixth form college, the case manager must
1205 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

1206 5.147. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,
1207 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she
1208 is considered unsuitable to work with children and young people.

1209 5.148. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is
1210 provided at paragraph 179.

1211 5.149. All managers must read the group leavers policy – all referrals must be recorded with HR so they can
1212 ensure any future references are correct. The references team log referrals so this can be completed. This
1213 will apply to both: DBS and TRA.

1214 Record keeping

1215 5.150. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is
1216 made, staff must keep clear and accurate records using a Concern Form.

1217 5.151. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in
1218 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns
1219 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch
1220 have Concern/Safeguarding function to record any concerns being raised. A report per child/young
1221 person can also be generated.

1222 5.152. Records should be factual, accurate, concise, ethical and relevant.

1223 5.153. All recording of written information should be legible and discussions with other professionals and
1224 agencies should be recorded chronologically.

1225 5.154. There will be a safeguarding section/folder for each Individual, which will hold any concerns/safeguarding
1226 documentation for that individual. At the front of each folder, there is an Index for Individual's Concerns.
1227 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1228 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure
1229 location.

1230 5.155. Each location apart from those using Behaviour Watch system or MyConcern will also maintain **25.07.**
1231 **Central Log of Concerns and Safeguarding** of all concerns raised at the location including the
1232 safeguarding information where the concern has escalated. Where this is held as a paper version this is
1233 to be made into a bound booklet and completed by the DSL. If kept electronically, access is to be
1234 restricted to the DSL and deputies only. In either case, this should be kept in a secure location.

1235 **Monitoring**

1236 5.156. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded,
1237 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section**
1238 **9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators
1239 (KPIs) using **CambianKPI** and the identification and management of safeguarding risks. A report on the
1240 position of every site in relation to their KPIs is produced every Wednesday.

1241 **Training**

1242 5.157. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction
1243 introduces the new staff member to the policy, procedure and practice at the location. They will also be
1244 orientated as to where to find information regarding safeguarding including relevant posters around the
1245 location. As part of their induction all staff are required to read this policy and confirm that, they
1246 understand their role in safeguarding and protecting young people within the service they are going to
1247 work.

1248 5.158. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must
1249 be completed as part of staff member induction and annually thereafter. This should include online
1250 safety. This is to maintain staff awareness of their responsibilities in relation to children /young
1251 people/young adult's safeguarding.

1252 5.159. Staff will not be allowed to work with individuals unless they have completed the above training. The
1253 school/college/home must check that supply/agency staff have completed basic awareness training
1254 before being allowed into contact with Individuals.

1255 5.160. Contractors and others on site who might have unsupervised access to individuals must also complete
1256 basic awareness training before being allowed to start work.

1257 5.161. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and
1258 practice throughout the year. This can be undertaken in various forums: as a face-to-face or online
1259 session, staff meetings or workshops. In addition to this, safeguarding updates including various
1260 resources are provided to schools and colleges by the external Safeguarding Network.

1261 5.162. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge
1262 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA
1263 within the boundaries they operate and be refreshed at least every two years. Both should also undertake
1264 Prevent awareness training.

1265 **Confidentiality and information sharing**

1266 5.163. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting
1267 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear
1268 powers to share, hold and use information for these purposes. Staff should be proactive in sharing
1269 information as early as possible to help identify, assess and respond to risks or concerns about the safety
1270 and welfare of children/ young people whether this is when problems are first emerging, or where a child
1271 is already known to local authority children's social care.

1272 5.164. Where the police are involved, wherever possible the school or college should ask the police to obtain
1273 consent from the individuals involved to share their statements and evidence for use in the employer's

- 1274 disciplinary process. This should be done as their investigation proceeds and will enable the police to
1275 share relevant information without delaying the conclusion of their investigation or any court case.
- 1276 5.165. The Safeguarding authority should adopt a similar procedure when making enquiries to determine
1277 whether the child or children named in the allegation need protection or services, so that any information
1278 obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the
1279 employer without delay.
- 1280 5.166. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the
1281 following:
- 1282 • who needs to know and exactly what information can be shared;
 - 1283 • how to manage speculation, leaks and gossip
 - 1284 • what, if any, information can be reasonably given to the wider community to reduce speculation;
1285 and
 - 1286 • how to manage press interest if, and when, it should arise.
- 1287 5.167. Exchange or disclose of personal information with other agencies will be completed in accordance with
1288 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation including
1289 the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process
1290 personal information fairly and lawfully and to keep the information they hold safe and secure.
- 1291 5.168. Information relating to individual Safeguarding cases is confidential, although some information can be
1292 shared with relevant staff. This should be done only on a 'need to know' basis.
- 1293 5.169. Governance Boards and proprietor should ensure relevant staff have due regard to the relevant data
1294 protection principles, which allow them to share (and withhold) personal information, as provided for in
1295 the Data Protection Act 2018 and the GDPR. This includes:
- 1296 • being confident of the processing conditions which allow them to store and share
1297 information for safeguarding purposes, including information which is sensitive and
1298 personal, and should be treated as 'special category personal data'.
 - 1299 • understanding that 'safeguarding of children and individuals at risk' is a processing
1300 condition that allows practitioners to share special category personal data. This includes
1301 allowing practitioners to share information without consent where there is good reason
1302 to do so, and that the sharing of information will enhance the safeguarding of a child in
1303 a timely manner but it is not possible to gain consent, it cannot be reasonably expected
1304 that a practitioner gains consent, or if to gain consent would place a child at risk.
 - 1305 • for schools, not providing pupils' personal data where the serious harm test under the
1306 legislation is met. For example, in a situation where a child is in a refuge or another form
1307 of emergency accommodation, and the serious harms test is met, they must withhold

1308 providing the data in compliance with schools' obligations under the Data Protection Act
1309 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

1310 5.170. When sharing safeguarding information regarding an individual, staff will need to consider the following:

- 1311 • Information should only be shared on a 'need to know' basis when it is in the best interests
1312 of the individual
- 1313 • Informed consent should be obtained but, if this is not possible and other adults are at risk
1314 of abuse or neglect, it may be necessary to override the requirement
- 1315 • Distinguish fact from opinion
- 1316 • Ensure you are giving the right information about the right person
- 1317 • Ensure you are sharing information securely
- 1318 • Inform the person that the information has been shared if they were not already aware of
1319 this and if it would not create or increase risk of harm to them/others.

1320 5.171. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of
1321 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the
1322 need to safeguard and promote the welfare and protect the safety of children.

1323 5.172. Further details on information sharing can be found in:

- 1324 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting
1325 guide to information sharing
- 1326 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children,
1327 Young People, Parents and Carers](#). The seven golden rules for sharing information will
1328 be especially useful
- 1329 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and
1330 guidance from the department
- 1331 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection
1332 activity, including compliance with the GDPR.

1333 5.173. The following wording is to be added to any covering letter where we are sharing documentation:

1334 "The material contained in this letter and its enclosures are confidential to Cambian Group and the
1335 persons named within the documentation. The documentation is delivered only in accordance with a
1336 perceived legal obligation to make the documentation available and upon the strict understanding that
1337 the recipient and all members of the recipient's staff will undertake to preserve confidentiality and not
1338 in any way share the documentation or any details of the information therein contained with any other
1339 party. Any person receiving this information who breaches these obligations of confidentiality will be

1340 held strictly responsible and will be expected to indemnify Cambian Group and any persons named within
1341 the documentation against any losses that may arise as a result of misuse of this material”.

1342 5.174. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for
1343 the Caldicott Guardian at our location is Dr Vishelle Kamath, Group Medical Director for Caretech.

1344 5.175. Failure to follow this policy and local procedure may result in disciplinary action.

1345 **Complaints and Monitoring**

1346 5.176. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**
1347 **procedure**, with reference to the our Designated Safeguarding Officer who is Stephen Doughty (DSL) and
1348 Milton Keynes Safeguarding Children’s Board

1349 **6. Accountability**

1350 6.1. Stephen Doughty is the DSL at Cambian Bletchley Park School and has lead responsibility for protecting
1351 and safeguarding children, young people and young adults and liaising with the local authority and other
1352 local agencies as appropriate. This includes young person protections, referrals, raising awareness,
1353 training, allocating resources and supporting/directing staff within the Location. In all matters, relating
1354 to young person protection and safeguarding Cambian Bletchley Park School will follow the procedures
1355 outlined in this policy.

1356 6.2. The content and effective implementation of policy and procedures are subject to routine monitoring by
1357 the Head of Service. Our Managing Director, Andrew Sutherland will undertake a full annual review of
1358 the content and effective application of this policy and associated procedures. The date for the next
1359 scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes in
1360 legislation, regulatory requirements or as a result of best practice guidance.

1361 6.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director
1362 Compliance, who will support and promote the development of initiatives to improve the prevention,
1363 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is
1364 also responsible for reporting on safeguarding and providing executive leadership.

1365 6.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1366 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can
1367 be stressful and distressing for staff.

1368 6.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,
1369 allied health professionals and nurses) should understand how their professional standards and
1370 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

1371 6.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1372 need to share a common view of what types of behaviour may be abuse or neglect and what should be
1373 an initial response to suspicion or allegation of abuse or neglect.

1374 6.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency
1375 safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies
1376 which define the local practice that must be followed.

1377 6.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable
1378 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact
1379 names and details if required.

1380 **7. Further Safeguarding information – what everyone needs to know**

1381 7.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours
1382 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual



1383 and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are
1384 at risk.
1385
1386