

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

## Cambian Great Dunmow School

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## 92 1. Monitoring and review

93 1.1 The Cambian (the Proprietor) will undertake a formal annual review of this policy for the purpose of  
94 monitoring and of the efficiency with which the related duties have been discharged, by no later than one

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

97 1.2 The local content of this policy will be subject to continuous monitoring, refinement and audit by the Head  
98 of Service.

99  
100 Signed:



Jeremy Wiles  
Group Executive Director- Children's Services  
Date: August 2021



Kicha Mitchell  
Operations Director- Education Support  
June 2022

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102 **2. Terminology**

103 2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as  
104 follows:

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<b>'Establishment' or 'Location'</b>	This is a generic term which means the School
<b>Individual</b>	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Great Dunmow School we have children and young people or attending] our [schoolbetween the ages of 11-18
<b>Head of Service</b>	This is the senior person with overall responsibility for the School – The headteacher
<b>Key Worker</b>	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
<b>Parent, Carer, Guardian</b>	Means parent or person with Parental Responsibility
<b>Regulatory Authority</b>	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
<b>Social Worker</b>	This means the worker allocated to the individual's family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
<b>Safeguarding Authority</b>	Children's Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] - England
<b>LADO</b>	Local Authority Designated Officer
<b>DSL/DSL Deputy</b>	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
<b>Placing Authority</b>	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
<b>Staff</b>	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
<b>CambianKPI</b>	The online in-house information system which holds data for each site on quality measures.

112

### 113 3. Definitions and age related arrangements

114 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies  
 115 to children and young people until they reach the age of 18, Keeping Children Safe in Education (2021)  
 116 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)  
 117 Act 2021.

118 3.2. **Adults are over the age of 18.** Over 18 year olds are covered by the Local Safeguarding Adult Boards  
 119 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse  
 120 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect;  
 121 and as a result of their particular care and support needs, is unable to protect themselves from either  
 122 the risk of, or the experience of abuse or neglect'. We refer to adult service users in our provision as  
 123 **young adults** due to the fact we provide children's services up to the age of 25.

124 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the  
 125 legal framework for social service provision in Wales. It sets out what must and should be done to

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

128 3.4. Staff working with young adults aged 18 and over, who receive education, care and support from our  
129 children’s services division will follow the Adult safeguarding referral process to LSAB/MASH/Regional  
130 Safeguarding Children’s Boards depending on local arrangements.

131 3.5. This policy addresses children and young people up to the age of 18 and those over the age of 18 who  
132 attend a day or residential school – this might be 38 or 52 weeks’ provision. Some children attending  
133 school live in children’s homes or care homes across England and Wales, hence the reason why this  
134 policy and procedure is more comprehensive than that of a traditional day school or college. Our  
135 safeguarding responsibility extends beyond day education and often covers 24hrs services regulated  
136 by various regulators across the UK.

137 3.6. Where we make references to schools and colleges, this also includes associated children’s or care  
138 homes in which children/young people live. Where we make references to children’s or care homes,  
139 those cover all children’s/care homes including those within the children’s residential care division.

#### 140 Multi agency working – Safeguarding Partners & Children’s Social Care

141 3.7. Children Social Care - provide support to children in need of help and protection, including children  
142 with disabilities. Services include statutory assessment and care planning for children at risk of  
143 significant harm, provision for cared for children and care experienced young people, as well as  
144 fostering and adoption services.

145 3.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements.  
146 Governing bodies and proprietors should ensure that the school contributes to multi-agency working  
147 in line with statutory guidance [Working Together to Safeguard Children](#).

148 3.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area  
149 within the local authority and the chief officer of police for an area (any part of which falls) within the  
150 local authority area made arrangements to work together with appropriate relevant agencies to  
151 safeguard and promote the welfare of local children, including identifying and responding to their  
152 needs.

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

156 3.11. The three safeguarding partners should make arrangements to allow all schools and colleges in the  
157 local area to be fully engaged, involved and included in safeguarding arrangements. It is expected  
158 that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and

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

### 161 Child protection definition

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

### 165 Safeguarding definition – Working together to safeguard children 2018

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

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

### 172 Safeguarding definition – Keeping Children Safe in Education 2021

173 3.14. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes  
174 into contact with children and their families has a role to play. In order to fulfil this responsibility  
175 effectively, all practitioners should make sure their approach is child-centred. This means that they  
176 should consider, at all times, what is in the best interests of the child.

177 3.15. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

### 183 Safeguarding Adults

184 3.16. Safeguarding Adults means protecting an adult’s right to live in safety, free from abuse and neglect.  
185 It is about people and organisations working together to prevent and stop both the risks and experience of  
186 abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where  
187 appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

188 3.17. The statutory guidance enshrines the **six principles** of adults safeguarding:

- 189
- 190 • Empowerment - presumption of person led decisions and informed consent
- 191 • Prevention - it is better to take action before harm occurs
- 192 • Proportionality - proportionate and least intrusive response appropriate to the risk presented
- 193 • Protection - support and representation for those in greatest need
- 194 • Partnerships - local solutions through services working with their communities
- 195 • Accountability - accountability and transparency in delivering safeguarding

196 3.18. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and  
197 procedures which apply to its Adults’ Services. Both policies can be accessed via Rezume. Services  
198 operating in Wales can find their Safeguarding Regional Boards via this hyperlink which provides  
199 access to local procedures for each Board <https://safeguardingboard.wales/find-your-board/>.

### 200 The difference between safeguarding and child protection

201 3.19. In relation to children’s services - in practice safeguarding is the policies and practices that  
202 schools/colleges/children’s homes employ to keep children safe and promote their well-being. This

203 means everything from security of the buildings, to the safe recruitment of staff and everything in  
204 between. **Appendix 10.** Illustrates Safeguarding in children’s services.

## 205 Abuse and neglect – child and young person context

206 3.20. In the context of a child/young person abuse and neglect are forms of maltreatment. Somebody may  
207 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm.  
208 Children/young people may be abused in a family or in an institutional or community setting, by those  
209 known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another  
210 child/young person or children/young people.

211 3.21. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of  
212 these. The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse -**  
213 **children.** The signs that someone could be a victim or an abuser have been explored in **Appendix 6**  
214 **and Appendix 7.** Parents, carers and other people can harm children and young people by direct acts  
215 and/or failure to provide proper care. It should also be understood that children can also be abused  
216 by being sexually exploited, or subject to honour based abuse, domestic violence, forced marriage,  
217 female genital mutilation and through online social media. See **Appendix 11 - Further safeguarding**  
218 **information – what everyone need to know.**

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

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

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

## 227 4. Purpose

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

230 4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance,** and it complies  
231 with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information**  
232 **Poster.** This policy complies with Great Dunmow County Council Safeguarding Board’s locally agreed  
233 procedures. Printed or electronic copies of the Local Safeguarding Children’s Partnerships (LSCP), Local  
234 Safeguarding Adults Board (LSAB) or Regional Safeguarding Children’s Boards (Wales) procedures are  
235 available in every setting.

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

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

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

243 4.6. In addition, staff should be aware of and have access to the NSPCC whistle-blowing helpline number  
244 **0800 028 0285** and the Cambian Whistleblowing service operated by EthicsPoint on **0800 086 9128.**



245 More information about EthicsPoint and how it can be contacted can be found in the Whistleblowing  
246 policy.

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

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

## 252 5. Policy

### 253 Safeguarding culture of the organisation

254 5.1. Cambian safeguarding culture can be best described as:

255 - **Proactive**, being professionally curious to determine further information in the interests of the child.  
256 It is essential that staff exercise professional curiosity at all times as it is likely that signs of any form  
257 of abuse including neglect will be identified when dealing with an un-associated incident. Having  
258 strong governance and leadership, raising awareness through and enhancing children’s and  
259 young people’s capacity around the risks and their own safety, regular reflective supervision).

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

262 - **Reflective** (understanding ‘how we got there in the first place’, completing a reflective account of  
263 events, involving other key professionals in future planning, identifying actions and further changes  
264 to be made.

265 5.2. Child Protection and Safeguarding is everyone’s responsibility. Everyone working for or visiting our  
266 locations has a responsibility to understand and implement this policy and procedure at all times.

267 5.3. All Individuals in our services have a right to feel safe, secure and be protected from harm.

268 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all  
269 Individuals with Special Educational Needs (SEN) and disabilities:

270 • Are more likely to be abused or neglected;

271 • May display behaviour, mood and/or injury which may relate to possible abuse and not just their  
272 SEN or a particular disability.

273 • Have a higher risk of peer group isolation.

274 • Can be disproportionately impacted by things like bullying without outwardly showing any signs.

275 • Experience communication barriers and difficulties in overcoming these barriers.

276 5.5. The most common reason for children or young people being looked after is as a result of  
277 abuse/neglect. We will ensure all staff have the skills, knowledge and understanding to help keep  
278 children and young people safe.

279 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion  
280 or disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care  
281 home or in the community, taking into account contextual safeguarding, see [Appendix 11 - Further](#)



282 **safeguarding information – what everyone need to know** which also contains information related to  
283 safeguarding issues related to individual children and young people’s needs.

284 5.7. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding  
285 of safeguarding, through both formal curriculum and informal opportunities.

286 5.8. As an organisation we acknowledge that working in partnership with other agencies protects  
287 Individuals and reduces risk and so we will engage in partnership, working throughout the child  
288 protection process to safeguard children and will equally work through safeguarding adults’  
289 procedures as directed by local procedures.

290 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance  
291 referred to in this document can be found in separate appendices at the end of this document.

## 292 **Divisional Safeguarding Board**

293 5.10. As an organisation Caretech children’s services operates 3 Divisional Safeguarding Boards: Education,  
294 Residential Care and Fostering. The main purpose of each board is to ensure that all services  
295 across all divisions discharge their responsibilities effectively for assuring safe and secure services  
296 for children and young people, and manage all safeguarding risks appropriately within its own  
297 workforce, including direct employees and also the contracted workforce (supply  
298 workers/agency/contractor and subcontractors). The full terms of reference for each Board is available  
299 on [Cambian Point](#).

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

301 5.11. KCSiE2021 guidance replaces Keeping Children Safe in Education 2020 updated in January 2021. The  
302 changes will come into force from September 2021. The statutory guidance should be read and  
303 followed by the Proprietor(s) of independent schools and non-maintained special schools and colleges.  
304 In both instances this includes including Senior Leadership Teams.

305 5.12. All staff in Caretech/Cambian schools and colleges must read at least [Part one of KCSiE2021](#) guidance  
306 and school/colleges should have a record to confirm this has been completed by the end of September  
307 2021.

308 5.13. HTs / Principals and DSL (or a deputy) should read the [whole KCSiE2021 Guidance](#).

309 5.14. The guidance also suggests that Governors and Proprietor should read [Annex A](#) which is a condensed  
310 version of Part one: ‘Annex A can be provided (instead of Part one) to those staff who do not directly  
311 work with children, if the governing body or proprietor think it will provide a better basis for those staff  
312 to promote the welfare and safeguard children’. The Organisation maintains that all staff including  
313 those supporting the school/college with frequent or less frequent visits to the site read at **least Part**  
314 **One** so all staff understand their safeguarding responsibilities.

315 5.16 The guidance should be read alongside:

- 316 • statutory guidance - [Working Together to Safeguard Children](#)
- 317 • departmental advice - [What to do if you are Worried a Child is Being Abused - Advice for](#)  
318 [Practitioners](#) ; and;
- 319 • [Part 5 of KCSiE2021](#) should be read alongside the departmental advice - [Sexual violence and sexual](#)  
320 [harassment between children in schools and colleges](#) which contains further details on: what  
321 sexual violence and sexual harassment constitutes, important context to be aware of, including;  
322 what is consent, power imbalances, and developmental stages, harmful sexual behaviour (HSB),  
323 including that a child displaying HSB may be an indication that they are a victim of abuse  
324 themselves, related legal responsibilities for schools and colleges, advice on a whole school  
325 approach to preventing child on child sexual violence and sexual harassment, and more detailed  
326 advice on responding to reports of sexual violence and sexual harassment, including safeguarding  
327 and supporting both the victim(s) and alleged perpetrator(s).

328 5.15. In July 2021 DSL (or a deputy) within Education division, Heads/Principals, Representative from  
329 Children’s residential care (Senior Managers), Representatives from Business Support Functions and  
330 Directors attended KCSiE2021 webinar provided by the Safeguarding Network. Following the webinar,

- 331 recording of session and the additional learning resources have been shared with the participants to  
332 support dissemination to their teams.
- 333 5.16. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan  
334 how the learning will take place with their staff, organise KCSiE2021 knowledge check (via Safeguarding  
335 Network) and ensure that the record of completed knowledge check is stored on MYRUS - the  
336 Organisation's Learning and Development platform .
- 337 5.17. The Heads/Principals and DSL should ensure that mechanisms are in place to assist staff to understand  
338 and discharge their role and responsibilities as set out in Part one of KCSiE2021 guidance. Schools and  
339 colleges and their staff are an important part of the wider safeguarding system for children. This system  
340 is described in the statutory guidance [Working Together to Safeguard Children](#).
- 341 5.18. All staff should be aware of systems within their school which support safeguarding and these should  
342 be explained to them as part of staff induction. This should include the:
- 343 - Child protection and safeguarding policy
  - 344 - Behaviour Support policy
  - 345 - Anti bullying policy
  - 346 - Whistleblowing policy, Code of conduct and Code of Practice policy
  - 347 - Missing from Care policy, local procedure for children missing from education
  - 348 - Role of the DSL (including the identity of the DSL and any deputies)
  - 349 - Have Access to policies and a copy of Part one of KCSiE2021
  - 350 - All staff should be aware of their local early help process and understand their role in it, more  
351 information can be found in [Working Together to Safeguard Children 2018](#)  
352 ([publishing.service.gov.uk](#)).
- 353 5.19. All staff should be aware of the process for making referrals to children's social care and for statutory  
354 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a  
355 child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they  
356 might be expected to play in such assessments.
- 357 5.20. Schools concerned about a child's welfare should refer their concern to local authority children's social  
358 care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's  
359 social care (and if appropriate the police) is made immediately. Referrals should follow the local referral  
360 process. Children's homes/care homes should follow their referral process as per their local procedure  
361 and contact Safeguarding Partner/Safeguarding Board as per their local Safeguarding procedure.
- 362 5.21. All staff should know what to do if a child tells them he/she is being abused, exploited or neglected.  
363 Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.  
364 This means only involving those who need to be involved, such as the DSL (or a deputy) and children's  
365 social care. Staff should never promise a child that they will not tell anyone about a report of any form  
366 of abuse, as this may ultimately not be in the best interests of the child.
- 367 5.22. Staff should **not** assume a colleague, or another professional will take action and share information  
368 that might be critical in keeping children safe. They should be mindful that early information sharing is  
369 vital for the effective identification, assessment, and allocation of appropriate service provision, whether  
370 this is when problems first emerge, or where a child is already known to local authority children's social  
371 care (such as a child in need or a child with a protection plan).

### 371 Whole service approach to Safeguarding

- 373 5.23. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school  
374 approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront

375 and underpin all relevant aspects of process and policy development. Ultimately, all systems,  
376 processes and policies should operate with the best interests of the child at their heart.

377 5.24. Where there is a safeguarding concern, the proprietor and service leaders should ensure the child's  
378 wishes and feelings are taken into account when determining what action to take and what services  
379 to provide. Systems should be in place, and they should be well promoted, easily understood and  
380 easily accessible for children to confidently report abuse, knowing their concerns will be treated  
381 seriously, and knowing they can safely express their views and give feedback.

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

383 5.25. Children with special educational needs or disabilities (SEND) or certain health conditions can face  
384 additional safeguarding challenges. There might be some additional barriers when recognising abuse  
385 and neglect in this group of children. These can include:

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

394 5.26. SEN division and other services where children have/may have SEND should consider extra pastoral  
395 support and attention for these children, along with ensuring any appropriate support for  
396 communication is in place. Further information can be found in the Department's: [SEND Code of  
397 Practice 0 to 25 and Supporting Pupils at School with Medical Conditions](#).

## 398 **6. Procedure**

### 399 **Roles and responsibilities**

400 6.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and**  
401 **visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and  
402 abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

403 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-  
404 contractors, partner organisations and visitors are aware of the policy and are supported to implement  
405 and work in accordance with it, as well as creating a management culture that encourages a focus on  
406 safeguarding. They must ensure that they are responsive, acting immediately if they become aware of

407 any safeguarding concerns, and supportive towards employees or volunteers who complain about  
408 breaches in this policy.

409 6.3. The **DSL** is responsible for handling reports and/or concerns, about the protection of children, young  
410 people and adults, appropriately and in accordance with the procedures that underpin this policy.  
411

412 6.4. **Our DSL** is James Nunn who is a senior member of our leadership team. The role of the DSL is to:

- 413 • Ensure this child protection and safeguarding policy and local arrangements are known,  
414 understood and used appropriately by the staff.
- 415 • Act as a source of support, advice and expertise for all staff, provide support to staff to carry out  
416 their safeguarding duties.
- 417 • Act as a point of contact with the Safeguarding Authority.
- 418 • Take lead responsibility for referring and managing safeguarding issues and cases, unless  
419 management of a particular case is passed on to a more senior member of the organisation – see  
420 section of allegations (those meeting harm threshold and those which don't meet LADO criteria).
- 421 • Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior  
422 mental health leads and special educational needs coordinators (SENCOs) or the named person  
423 with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and

- 424 safeguarding and welfare (including online and digital safety) and when deciding whether to make  
425 a referral by liaising with relevant agencies so that children’s needs are considered holistically.
- 426 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,  
427 where safeguarding concerns are linked to mental health.
- 428 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child  
429 or adult) and where appropriate - Local Authority Designated Officer (LADO).
- 430 • Liaise with the head teacher or principal (if they are not the DSL themselves) to inform him or her of  
431 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police  
432 investigations.
- 433 • As required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for  
434 child protection concerns in cases which concern a staff member.
- 435 • Refer cases to the Channel programme where there is a radicalisation concern as required.
- 436 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the  
437 Disclosure and Barring Service as required; and
- 438 • Refer cases where a crime may have been committed to the Police as required.
- 439 • Act as a source of advice, support and expertise within the location when deciding to make a  
440 referral by liaising with relevant agencies.
- 441 • Help promote educational outcomes by sharing the information about the welfare, safeguarding  
442 and child protection issues that children are experiencing, or have experienced, with teachers and  
443 school and college leadership staff.
- 444 • Identify staff safeguarding training needs and organise training for their staff.
- 445 • Participate in local safeguarding boards when required.
- 446 • Evaluate and contribute to high standards of safeguarding practice at the location.
- 447 • Work to ensure that the wellbeing of children and young people is in constant focus and that they  
448 are guarded from harm or abuse.
- 449 • Ensure the child protection and safeguarding policy is available publicly and parents/those with  
450 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may  
451 be made and the role of the school/college/home in this.
- 452 • Understands the relevant data protection legislation and regulations, especially The Data Protection  
453 Act 2018.
- 454 6.5. More details about the role of the DSL including their availability, management of referrals, information  
455 sharing, working with others, raising awareness and other can be found in [KCSIE 2021 Annex C – Role  
456 of the DSL](#).
- 457 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where  
458 asked do to so. There are arrangements for covering the role of the DSL when James Nunn is  
459 unavailable. Our Designated Deputy is Anna Caiger  
460
- 461 6.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected  
462 abuse and neglect should be given the highest priority.
- 463 6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and  
464 Safeguarding at Cambian**.
- 465 6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure** , which sets out clear  
466 steps to be followed when dealing with particular allegations, incidents or suspected physical injuries.  
467 Staff must use the correct forms when recording and managing concerns and allegations regarding  
468 the abuse of individuals. Education services must use Behaviour Watch system: Concern/Safeguarding  
469 function to record concerns. Where, throughout this policy, references are made to the ‘concern form’

470 this means either **25.04 Concern form** which is a word document (part of this policy) or the Behaviour  
471 Watch – Concern/Safeguarding functionality where the system is being used.

#### 472 **Information sharing and managing the child protection file**

473 6.10. **The DSL** is responsible for ensuring that child protection files are kept up to date. Information should  
474 be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate  
475 child protection file for each child. Schools and colleges should use the Behaviour Watch system -  
476 Concern/Safeguarding function to record all concerns and to generate Safeguarding Tracking Packs  
477 per child/young person as necessary.

478 6.11. Records should include:

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

482 6.12. They should ensure the file is only accessed by those who need to see it and where the file or content  
483 within it is shared, this happens in line with information sharing advice as set out in Part one of  
484 KCSIE2021. Schools and colleges using Behaviour Watch must set up their system Group purposes in  
485 line with Behaviour Watch guidance. Behaviour Watch 'Safeguarding Group' controls who can view  
486 and report on Concern/SG slips and 'Not Safeguarding Group' is an opposite Group to restrict who can  
487 complete certain sections within the Concern/SG slips.

488 6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for**  
489 **each pupil or student**. This goes beyond the legal minimum. It is good practice to give the school  
490 additional options to contact a responsible adult when a child missing education is also identified as  
491 a welfare and/or safeguarding concern.

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

493 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if  
494 they continue to work in regular or close contact with children in their present position, or in any capacity  
495 with children in a school or college. This guidance should be followed where it is alleged that anyone  
496 working in the school that provides education for children under 18 years of age, including supply  
497 teachers and volunteers has:

- 498 • A person(s) behaved in a way that has harmed a child, or may have harmed a child, and/or,
- 499 • A person(s) possibly committed a criminal offence against or related to a child, and/or,
- 500 • A person(s) behaved towards a child or children in a way that indicates he or she may pose a risk  
501 of harm to children; and/or,
- 502 • A person(s) behaved or may have behaved in a way that indicates they may not be suitable to work  
503 with children

504 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of](#)  
505 [the Children Act 1989 as amended by the Adoption and Children Act 2002](#).

506 6.16. The last bullet point above includes behaviour that may have happened outside of school that might  
507 make an individual unsuitable to work with children, this is known as transferable risk. Where  
508 appropriate an assessment of transferable risk to children with whom the person works should be  
509 undertaken. If in doubt seek advice from the local authority designated officer (LADO).

510 6.17. This above information relate to members of staff, supply staff and volunteers who are currently  
511 working in any school regardless of whether the school is where the alleged abuse took place.



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

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

515 6.18. Many children and young people in our services (Education and care) organisation have an allocated  
516 social worker due to safeguarding or welfare needs.

517 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's  
518 experiences of adversity and trauma can leave them vulnerable to further harm, as well as  
519 educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

520 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use  
521 this information so that decisions can be made in the best interests of the child's safety, welfare and  
522 educational outcomes. This should be considered as a matter of routine. There are clear powers to  
523 share this information under existing duties on both local authorities and schools and colleges to  
524 safeguard and promote the welfare of children.

525 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example,  
526 responding to unauthorised absence or missing education where there are known safeguarding risks)  
527 and about promoting welfare (for example, considering the provision of pastoral and/or academic  
528 support, alongside action by statutory services). Schools/colleges must follow missing from education  
529 protocol agreed with their LA.

#### 530 **Unexplained body marks**

531 6.22. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,  
532 swellings, cuts and scratches which by and large will be as a result of daily activities or for some  
533 Individuals as a result of self-injurious behaviour. However, all marks or physical changes must be  
534 recorded appropriately using (number to be added) weekly body chart. A Concern form must be  
535 completed for all unexplained marks and physical changes and passed to the DSL (or a deputy) along  
536 with copies of the last 3 days of Daily Diary notes and Activity Records. Parents/carers and social  
537 workers should always be kept informed. Concern log should be updated with concern and relevant  
538 reference number provided to concern.

539 6.23. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the  
540 correct course of action for dealing with unexplained body marks.

541 6.24. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if  
542 no reasonable explanation can be given the DSL must contact the Safeguarding Authority/LADO for  
543 further advice and mutual conclusion as to whether the matter should be treated as a Safeguarding  
544 Concern.

545 6.25. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be  
546 opened and safeguarding process followed.

547 6.26. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome  
548 must be shared with social worker and parents.

#### 549 **Disclosure from an Individual**

550 6.27. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**  
551 **procedure.**

552 6.28. It is important to note that children/young people may not find it easy to tell staff about their abuse  
553 verbally. Children/young people can show signs or act in ways that they hope adults will notice and  
554 react to. In some cases, the victim may not make a direct report. For example, a friend may make a  
555 report or a member of school staff may overhear a conversation that suggests a child has been harmed  
556 or a child's/young person's own behaviour might indicate that something is wrong. If staff have any  
557 concerns about a child's/young person's welfare, they should act on them immediately rather than



- 558 wait to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**  
559 **procedure.**
- 560 6.29. In case of reports of sexual violence and sexual harassment between children and young people, these  
561 are extremely complex to manage. It is essential that victims are protected, offered appropriate support  
562 and every effort is made to ensure their education and care is not disrupted. It is also important that  
563 other children, young people and staff are supported and protected as appropriate.
- 564 6.30. The service's initial response to a report from a child is incredibly important. How the staff respond to  
565 a report can encourage or undermine the confidence of future victims of sexual violence and sexual  
566 harassment to report or come forward.
- 567 6.31. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.  
568 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage  
569 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding  
570 Authority) to discuss next steps. Staff should only share the report with those people who are necessary  
571 in order to progress it. It is important that the victim understands what the next steps will be and who  
572 the report will be passed to.
- 573 6.32. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and  
574 how the report will be progressed, don't ask leading questions and only prompt the child where  
575 necessary with open questions – where, when, what, etc. It is important to note that whilst leading  
576 questions should be avoided, staff can ask children if they have been harmed and what the nature of  
577 that harm was.
- 578 6.33. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school  
579 staff. It is important that the person to whom the child discloses recognises that the child has placed  
580 them in a position of trust. They should be supportive and respectful of the child.
- 581 6.34. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the  
582 report and immediately write up a thorough summary. This allows the staff member to devote their full  
583 attention to the child and to listen to what they are saying. It may be appropriate to make notes during  
584 the report (especially if a second member of staff is present). However, if making notes, staff should be  
585 conscious of the need to remain engaged with the child and not appear distracted by the note taking.  
586 Either way, it is essential a written record is made using Concern form which is part of this policy. The  
587 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report  
588 to the DSL must be completed within an hour from the moment of the disclosure being made.
- 589 6.35. Only recording the facts as the child presents them. The notes should not reflect the personal opinion  
590 of the note taker. Staff should be aware that notes of such reports could become part of a statutory  
591 assessment by Safeguarding Authority and/or part of a criminal investigation.
- 592 6.36. In cases where either a child/young person informs the staff that an act of FGM – however described  
593 – has been carried out on her, or where the staff observes physical signs on a girl appearing to show  
594 that an act of FGM has been carried out these situations, the DSL must be informed, who will trigger  
595 child protection/safeguarding procedures described in this policy and contact the Police. If a  
596 child/young person is at immediate risk – the Police (999) must be contacted immediately. If a

- 597 child/young person required medical attention follow steps identified in 'Setting priorities' section  
598 below.
- 599 6.37. Remember, **do not**:
- 600 • Investigate the incident
- 601 • Ask leading questions
- 602 • Get the young person to repeat the disclosure over and over
- 603 • Make assumptions or offer alternative explanations
- 604 • Approach/inform the alleged abuser
- 605 6.38. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**  
606 **and recording procedure.**
- 607 6.39. All staff know that they can contact the Local Authority direct should that be necessary. Where a  
608 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local  
609 Safeguarding Adult Board. Where someone is over 18 but still receiving children's services, the matter  
610 should be dealt with by the local Safeguarding Adult Board.
- 611 6.40. For allegation made against a staff member or senior managers/directors follow relevant allegations  
612 procedures described later on in this policy.
- 613 6.41. Where contact is made with the Local Authority in which Cambian Great Dunmow School is  
614 geographically located, contact will also be made with the individual's own Local Authority and also  
615 the child/young person's social worker. This will be completed by one of the members of the  
616 school/college/home's safeguarding team.
- 617 6.42. In the case of serious harm, and/or the Individual is in immediate danger the local Police should be  
618 informed immediately and they can take immediate protective action as necessary.
- 619 6.43. If a member of staff feels their concerns are not being taken seriously then they are to inform a more  
620 senior manager, a Director of the Company or contact Ofsted/CQC/CIW/Estyn, the local safeguarding  
621 boards, the police or the **Whistleblowing Hotline – on 0800 086 9128.**

## 6 Risk Assessment

- 623 6.44. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk  
624 and needs assessment. Where there has been a report of sexual harassment, the need for a risk  
625 assessment should be considered on a case-by-case basis. The risk and needs assessment should  
626 consider:
- 627 • the victim, especially their protection and support,
- 628 • whether there may have been other victims,
- 629 • the alleged perpetrator(s); and
- 630 • all the other children, (and, if appropriate, adult students and staff) at the school  
631 especially, and any actions that are appropriate to protect them from the alleged  
632 perpetrator(s), or from future harms.
- 633 6.45. Risk assessments should be recorded (written or electronic) and should be kept under review. At all  
634 times, staff should be actively considering the risks posed to all their pupils and students and put  
635 adequate measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure  
636 they are engaging with Safeguarding Authority and specialist services as required. Where there has  
637 been a report of sexual violence, it is likely that professional risk assessments by social workers and or  
638 sexual violence specialists will be required. The above school risk assessment is not intended to replace  
639 the detailed assessments of expert professionals. Any such professional assessments should be used

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

## 642 Following a report - what to consider

643 6.46. Important considerations will include:

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

664 6.47. As always when concerned about the welfare of a child, all staff should act in the best interests of the  
665 child. In all cases, schools and colleges should follow general safeguarding principles as set out  
666 throughout this guidance. Immediate consideration should be given as to how best to support and  
667 protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

## 668 Options to manage the report

669 6.48. It is important that schools and colleges consider every report on a case-by-case basis. When to inform  
670 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going  
671 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school should  
672 speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be  
673 informed of the allegations. However, as per general safeguarding principles, this does not and should  
674 not stop the school taking immediate action to safeguard their children, where required.

675 6.49. There are four likely scenarios for schools and colleges to consider when managing any reports of  
676 sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and  
677 actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is  
678 particularly important to look out for potential patterns of concerning, problematic or inappropriate  
679 behaviour. Where a pattern is identified, the school should decide on a course of action. Consideration  
680 should be given as to whether there are wider cultural issues within the school that enabled the  
681 inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could  
682 be delivered to minimise the risk of it happening again. The four scenarios are:

- 683 • **Manage internally;** In some cases of sexual harassment, for example, one-off incidents,  
684 the school may take the view that the children concerned are not in need of early help or  
685 that referrals need to be made to statutory services and that it would be appropriate to

686 handle the incident internally, perhaps through utilising their behaviour policy and by  
687 providing pastoral support.

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

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

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

704 6.50. More information about the four areas listed above, considering bail conditions, managing any delays  
705 in the criminal process and the end of criminal process can be found in [KCSIE2021 Part 5 para 452](#).

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

707 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider  
708 whether the child and/or the person who has made the allegation is in need of help or may have been  
709 abused by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding  
710 authority may be appropriate.

711 6.52. If a report is shown to be deliberately invented or malicious, the school or college, should consider  
712 whether any disciplinary action is appropriate against the individual who made it as per their own  
713 behaviour policy.

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

715 6.53. The needs and wishes of the victim should be paramount (along with protecting the child) in any  
716 response. It is important they feel in as much control of the process as is reasonably possible. Wherever  
717 possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority  
718 should be to make the victim's daily experience as normal as possible, so that the school is a safe  
719 space for them.

720 6.54. Consider the age and the developmental stage of the victim, the nature of the allegations and the  
721 potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual  
722 violence and sexual harassment, a power imbalance is likely to have been created between the victim  
723 and alleged perpetrator(s).

724 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel  
725 ashamed for making a report. This has been made clear throughout this policy and procedure.

726 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The  
727 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different  
728 from that for a report of rape.

729 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,  
730 mental, and sexual health problems and unwanted pregnancy. Children and young people that have  
731 a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual  
732 Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and

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

735 6.58. More information about Early help, Children and young people’s Independent Sexual Violence Advisors  
736 and ChISVAs services (where available), CAMHS and other can be found in [KCSIE 2021 Part 5 para 456](#).

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

738 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental  
739 advice: [Sexual violence and sexual harassment between children at schools and colleges](#). The  
740 following principles are based on effective safeguarding practice and should help shape any decisions  
741 regarding safeguarding and supporting the alleged perpetrator(s):

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

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

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

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

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

764 6.60. More information in relation to this section can be found in [KCSIE 2021 Part 5 para 464](#).

### 7 Setting priorities

766 6.61. The priority, at all stages throughout the child protection or safeguarding process, is the interests and  
767 safety of the individual.

768 6.62. Where appropriate, any concerns will be discussed with the Individual’s family / carers and where  
769 possible their agreement will be sought to making a referral to the Local Authority. However, where  
770 there is a conflict of interests between the Individual and parent/guardian, the interests of the Individual  
771 must take priority and Cambian Great Dunmow School the right to contact the Individual’s local  
772 authority, Social Care or the Police, without notifying parents/carers if this is in their best interests.

773 6.63. If an urgent medical attention or advice is required and GP/speciality doctor is not available, staff MUST  
774 use the NHS 111 service. NHS 111 is available 24 hours a day, 7 days a week.

775 6.64. If the situation is life - threatening, staff must call 999 immediately and ask for an ambulance.  
776 Alternatively, if it’s assessed to be in the best interest of the child/young person - the DSL MUST take  
777 the Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local

778 Authority/Police, remembering that every reasonable effort should be made to inform the  
779 parents/carers as soon as possible.

780 6.65. If the suspected abuse is sexual, then the medical professional must determine if the medical  
781 examination should be delayed until the Local Authority and the Police can liaise with the hospital.  
782 There is a possibility that the needs of the young person are such that medical attention is the priority,  
783 in such case medical professional's judgment must be followed. There must at all times be an  
784 Appropriate adult (parent guardian or a social worker) with the individual whether from the Individual's  
785 care home/school/college, the Local Authority or the Police, if the parents/carers are not included. This  
786 section must be read in conjunction with our **0.29. Child Sexual Exploitation policy**.

787 6.66. Cambian will provide an advocate to each Individual where appropriate, if they are unable to speak  
788 for themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA.  
789 Further information on MCA are available in our **0.13. Mental Capacity and Consent policy**.

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

791 6.67. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures  
792 for dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an  
793 Individual is suffering or likely to suffer significant harm'. DSL must refer peer on peer abuse to a  
794 Safeguarding Authority, local Authority and Regulator.

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

796 6.68. If we were given information that suggested that someone who does not reside at or attends our  
797 location has been abused by one of our members of staff, the DSL would immediately report this to  
798 the Local Authority and LADO. The Head of Service must be kept informed and HR Business Partner  
799 consulted. Should the staff member be involved we would then formally advise the member of staff of  
800 the allegation, making it clear that we would not play any part in the investigatory process. The  
801 employee would be advised of the possibility of facing suspension, re-assignment to other duties (to  
802 manage any perceived risks) etc., in exactly the same way as if the allegation had involved an Individual  
803 at our home/school/college. However, HR Business Partner must be consulted before any action is  
804 taken. If the allegation is subsequently proved to be unfounded, he or she would be given full support  
805 in resuming their career. Should we be asked by LADO/Safeguarding authority to be involved in any  
806 potential investigations or parts of it, a HR Business Partner will have to be consulted first. At this point  
807 an assessment will need to be made to identify what detail (if any) can be disclosed to a member of  
808 staff involved.

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

810 6.69. If we were given information that suggested that someone who does not reside at or attends our  
811 location has been abused by a third party (known or unknown to the provision), the DSL would  
812 immediately report this to the Local Authority and Police. The Head of Service must be kept informed.



813 DSL will follow advice provided by the leading agency and report back to the Head of Service who will  
814 explore any associated risk/s in relation to the provision.

### 81 Allegations against staff

816 6.70. All allegations must be reported to the DSL [James Nunn] or in their absence to DSL Deputy Anna  
817 Caiger– see your local Safeguarding poster. Also, where appropriate - HR Business Partner (Alexandra  
818 Wainwright )must be consulted.

819 6.71. When an allegation is made against a member of staff, set procedures must be followed, see the  
820 flow chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.

821 6.72. Staff MUST act on every allegation, all repeated allegations must be treated as new and carefully  
822 assessed and investigated. Staff who are the subject of an allegation have the right to have their case  
823 dealt with fairly, quickly and consistently and to be kept informed of its progress.

824 6.73. Staff should refer to the **25.08.Guidance for staff who have the allegation made against them** provided  
825 for what to do in the event an allegation is made against them.

### 82 Allegations against staff in Education

827 6.74. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and  
828 contractors. KCSiE2021 splits the type of allegations into two groups:

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

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

833 6.75. This is about managing cases of allegations that might indicate a person would pose a risk of harm if  
834 they continue to work in regular or close contact with children in their present position, or in any capacity  
835 with children in a school or college. The KCSiE2021 guidance should be followed where allegations are  
836 made against anyone working in the school that provides education for children under 18 years of age,  
837 including supply teachers and volunteers.

838 6.76. The information above relate to members of staff, supply staff, volunteers and contractors who are  
839 currently working in any school regardless of whether the school is where the alleged abuse took  
840 place. In Education allegations against people listed above should be referred to the Head/Principal  
841 who is often the DSL, however where the Head/Principal is not the DSL, allegations against staff  
842 including supply, volunteers and contractors must be referred to the Head/Principal. This is because  
843 the concern/allegation may align with other performance or personal related issues the Head/Principal  
844 might already be aware of, whereas the DSL may not be. The Principal/Head should ensure the DSL is  
845 briefed as appropriate and will then decide who the case should be led by – the DSL or themselves.  
846 Allegations against a teacher who is no longer teaching should be referred **to the police** and HR  
847 Business Partner advised.

848 6.77. Where an adult makes an allegation to a school that they were abused as a child, the individual should  
849 be advised to report the allegation to the police. Non-recent allegations made by a child, should be  
850 reported to the LADO in line with the local authority’s procedures for dealing with non-recent  
851 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported  
852 no matter how long ago it happened.

853 6.78. Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher  
854 because of serious misconduct, or might have dismissed them or ceased to use their services had they  
855 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching



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

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

859 6.79. In some circumstances schools and colleges will have to consider an allegation against an individual  
860 not directly employed by them, where its disciplinary procedures do not fully apply because agencies  
861 will have their own policies and procedures; for example, supply teachers or contracted staff provided  
862 by an employment agency or business.

863 6.80. Whilst The Organisation's schools and colleges are not the employer of supply teachers, they should  
864 ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use  
865 a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO  
866 to determine a suitable outcome. Schools and colleges must also consult HR Business Partner who  
867 may advise further. Governing bodies and proprietors should discuss with the supply agency or  
868 agencies where the supply teacher is working across a number of schools or colleges, whether it is  
869 appropriate to suspend the supply teacher, or redeploy them to another part of the school or college,  
870 whilst they carry out their investigation.

871 6.81. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or  
872 children's social care. The school will usually take the lead because agencies do not have direct access  
873 to children or other school or college staff, so they will not be able to collect the facts when an allegation  
874 is made, nor do they have all the relevant information required by the LADO as part of the referral  
875 process.

876 6.82. When using a supply agency, schools and colleges should inform the agency of its process for  
877 managing allegations but also take account of the agency's policies and investigatory process and  
878 their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human  
879 resource manager or equivalent to meetings and keeping them up to date with information about its  
880 policies. It is important we not blur the lines of employment, so in case there is any confusion, HR  
881 Business Partner should be consulted.  
882

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

884 6.83. All allegations must be reported to:

885 - Education division: Regional Education Lead Kicha Mitchell.. For the DSL fulfilling the role as their  
886 substantive role, all allegations must be reported to the Principal/Head.

887 - Children's residential care division: Regional Manager Sarah Love unless Regional Manager is the  
888 DSL in which case the matter will be referred to the Managing Director.

889 6.84. Depending on the division and who is the service DSL, people notified of allegation made (see above)  
890 will then refer the matter to local Safeguarding Authority/LADO and notify their line manager:

891 Education division: Regional Education Lead Kicha Mitchell or

892 - Managing Director for Education Andrew Sutherland who is also the Proprietor representative for  
893 Education

894 **6.85.** The person who referred the matter to local Safeguarding Authority/LADO in line with agreed course  
895 of action will decide about who will lead the case including management investigation – should the  
896 allegation threshold be met. The appropriate HR Business Partner should be notified, so they can  
897 advise and where required - support the investigation.

898 6.86. **Services using Behaviour Watch system** – allegations made against the DSL or DSL Deputy who have  
899 full access to the system including Concern/Safeguarding function, should not be initially entered to  
900 the system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as  
901 they would have been prior to implementation of the Behaviour Watch. This is to ensure that no one,  
902 including those who are part of the service's Safeguarding Team are able to see the details of their  
903 own case which could have a detrimental impact on the investigation itself and the outcome of it.

904 However, once the case has been concluded, a decision should then be made about whether or not  
905 the detail related to the case should be retrospectively entered in to Behaviour Watch or kept in the  
906 original format. Such a decision should be made by the Case Manager, Managing Director and a  
907 member of HR Team. Should a decision be made to keep it in the original format, a Concern/SG slip in  
908 the Behaviour Watch must still be retrospectively opened and a note added to reflect that there was  
909 an allegation made against the DSL/DSL Deputy but without specifying any further detail about the  
910 character of the allegation. Instead a reference number of the case and location of the pack related to  
911 the case is provided. This action will ensure that the case has been captured in the system which will  
912 then allow the service to generate a log with accurate numbers of concerns and safeguarding cases  
913 for the service.

#### 914 Allegations against the Regional Manager/other Regional staff

915 6.87. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
916 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO. Following this,  
917 the allegation should be passed to the identified senior person to follow through with local  
918 Safeguarding Authority/LADO and subsequently act in line with agreed course of action. This means  
919 that the DSL will retain the responsibility to report the initial concern, but will have no further part in the  
920 process regarding gathering any information or, should it be required, in the actual investigation in  
921 relation to a senior member.

922 6.88. Allegations not linked to specific site must be reported to Managing Director who will refer the matter  
923 to local Safeguarding Authority/LADO and act in line with agreed course of action.

924 6.89. The appropriate HR Business Partner should be notified, so they can advise and where required -  
925 support the investigation.

#### 926 Allegations against the Managing Director

927 6.90. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral  
928 to local Safeguarding Authority/LADO. Following this, the allegation should be passed to the identified  
929 senior person to follow through with local Safeguarding Authority/LADO and subsequently act in line  
930 with agreed course of action. This means that the DSL will retain the responsibility to report the initial  
931 concern, but will have no further part in the process regarding gathering any information or, should it  
932 be required, in the actual investigation in relation to a senior member.

933 6.91. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the  
934 matter to local Safeguarding Authority/LADO and act in line with agreed course of action.

935 6.92. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### 936 Allegations against any other Senior Leader

937 6.93. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
938 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO Following this,  
939 the allegation should be passed to the identified senior person to follow through with local  
940 Safeguarding Authority/LADO and subsequently act in line with agreed course of action. This means  
941 that the DSL will retain the responsibility to report the initial concern, but will have no further part in the  
942 process regarding gathering any information or, should it be required, in the actual investigation in  
943 relation to a senior member.

944 6.94. Allegations not linked to specific site must be reported to the person's (whom allegation is made  
945 against) line manager who will refer the matter to local Safeguarding Authority/LADO and act in line  
946 with agreed course of action.

947 6.95. The Head of HR should be notified, so they can advise and where required - support the investigation.

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

949 6.96. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
950 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO. Following this,  
951 the allegation should be passed to the identified senior person to follow through with local  
952 Safeguarding Authority/LADO and subsequently act in line with agreed course of action. This means

953 that the DSL will retain the responsibility to report the initial concern, but will have no further part in the  
954 process regarding gathering any information or, should it be required, in the actual investigation in  
955 relation to a senior member.

956 6.97. Allegations not linked to specific site must be reported to the Chair of the Care Governance Committee  
957 - Moira Livingstone - who will refer the matter to local Safeguarding Authority/LADO and act in line with  
958 agreed course of action.

959 6.98. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### 9 Allegations against the Chief Executive Officer

961 6.99. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral  
962 to local Safeguarding Authority/LADO Following this, the allegation should be passed to the identified  
963 senior person to follow through with local Safeguarding Authority/LADO and subsequently act in line  
964 with agreed course of action. This means that the DSL will retain the responsibility to report the initial  
965 concern, but will have no further part in the process regarding gathering any information or, should it  
966 be required, in the actual investigation in relation to a senior member.

967 6.100. Allegations not linked to a specific site must be reported to the Chair of the Care Governance Committee  
968 - Moira Livingstone who will refer the matter to local Safeguarding Authority/LADO and act in line with  
969 agreed course of action.

970 6.101. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### 9 Low level concerns

972 6.102. As part of their whole school approach to safeguarding, schools and colleges should ensure that they  
973 promote an open and transparent culture in which all concerns about all adults working in or on behalf  
974 of the school (including supply teachers, volunteers and contractors) are dealt with promptly and  
975 appropriately.

976 6.103. Creating a culture in which all concerns about adults (including allegations that do not meet the harms  
977 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is  
978 critical. If implemented correctly, this should encourage an open and transparent culture; enable  
979 schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise  
980 the risk of abuse; and ensure that adults working in or on behalf of the school are clear about  
981 professional boundaries and act within these boundaries, and in accordance with the ethos and values  
982 of the institution.

983 6.104. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards  
984 a child does not meet the threshold set out in **LADO referral criteria (KCSIE2021) – meeting the harm**

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

987 6.105. A low-level concern is any concern – no matter how small, and even if no more than causing a sense  
 988 of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in  
 989 a way that:

990 

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

  
 991 

- work; and

992 

- does not meet the allegations threshold or is otherwise not considered serious enough

  
 993 

- to consider a referral to the LADO

994 6.106. Examples of such behaviour could include, but are not limited to:

995 

- being over friendly with children;

996 

- having favourites;

997 

- taking photographs of children on their mobile phone (this depend on the circumstances,

  
 998 

- so it would require DSL assessment and LADO advice)

999 

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;

  
 1000 

- or,

1001 

- using inappropriate sexualised, intimidating or offensive language.

1002 6.107. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that  
 1003 may look to be inappropriate, but might not be in specific circumstances, through to that which is  
 1004 ultimately intended to enable abuse.

1005 6.108. It is crucial that any such concerns, including those which do not meet the harm threshold (see [Part](#)  
 1006 [Four - Section one](#)), are shared responsibly and with the right person, and recorded and dealt with  
 1007 appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf  
 1008 of schools and colleges from potential false allegations or misunderstandings.

### 1009 **The initial response to allegation**

1010 6.109. Where the school identifies a child/young person has been harmed, that there may be an immediate  
 1011 risk of harm to a child/young person or if the situation is an emergency, they should contact the  
 1012 Safeguarding Authority and as appropriate the police immediately as per the processes. There are two  
 1013 aspects to consider when an allegation is made:

1014 

- **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child

  
 1015 

- is not at risk and referring cases of suspected abuse to the local authority children’s social

  
 1016 

- care as described in Part one of this guidance.

1017 

- **Investigating and supporting the person subject to the allegation** - the case manager

  
 1018 

- should discuss with the LADO, the nature, content and context of the allegation, and

  
 1019 

- agree a course of action.

1020 6.110. When dealing with allegations, schools and colleges should:

1021 

- apply common sense and judgement

1022 

- deal with allegations quickly, fairly and consistently; and

1023 

- provide effective protection for the child and support the person subject to the allegation.

1024 6.111. Schools and colleges should ensure they understand the local authority arrangements for managing  
 1025 allegations, including the contact details and what information the LADO will require when an  
 1026 allegation is made. Before contacting the LADO, schools and colleges should conduct basic enquiries  
 1027 in line with local procedures to establish the facts to help them determine whether there is any

1028 foundation to the allegation, being careful not to jeopardise any future police investigation. For  
1029 example:

- 1030 • was the individual in the school at the time of the allegations?
- 1031 • did the individual, or could they have, come into contact with the child?
- 1032 • are there any witnesses? and,
- 1033 • was there any CCTV footage?

1034 6.112. These are just a sample of example questions. Services should be familiar with what initial information  
1035 the LADO will require. This information can be found in local policy and procedural guidance provided  
1036 by the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be  
1037 shared with the HR department to support any investigation.

1038 6.113. When to inform the individual of the allegation should be considered carefully on a case by case basis,  
1039 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1040 6.114. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion  
1041 involving the police and/or children’s social care will be convened in accordance with the statutory  
1042 guidance [Working Together to Safeguard Children](#).

1043 6.115. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the  
1044 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next  
1045 steps with the case manager (A ‘case manager’ will be the person leading any investigation. This will be  
1046 either the DSL/DSL Deputy which is often the Principal/Head/Registered Manager or, where the case  
1047 manager is the subject of an allegation, it will be the Proprietor or a Director nominated by them). A  
1048 LADO should be informed who will lead investigation to ensure there is no conflict of interest or any  
1049 other concerns related to the choice of the case manager.

#### 1050 **No Further Action**

1051 6.116. Where the initial discussion initial discussion leads to no further action, the case manager and the  
1052 LADO should:

- 1053 • record the decision and justification for it; and,
- 1054 • agree on what information should be put in writing to the individual concerned and by  
1055 whom.

#### 1056 **Further enquiries**

1057 6.117. Where further enquiries are required to enable a decision about how to proceed, the LADO and case  
1058 manager should discuss how and by whom the investigation will be undertaken. In straightforward  
1059 cases, the investigation should normally be undertaken by a senior member of the school’s or college’s  
1060 staff.

1061 6.118. Where there is a lack of appropriate resource within the school or college, or the nature or complexity  
1062 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional  
1063 Manager (Education or Care), a Director, HR Business Partner or an independent investigator if  
1064 appropriate.

1065 6.119. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly  
1066 as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly  
1067 intervals, depending on the complexity of the case.

1068 6.120. Wherever possible, the first review should take place no later than four weeks after the initial  
1069 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review  
1070 meeting if the investigation continues. The LADO will provide advice and guidance to schools and  
1071 colleges when considering allegations against adults working with children. The LADO’s role is not to

1072 investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that  
1073 is by the police, children's social care, the school or college, or a combination of these.

#### 1080 **Suspension**

1075 6.121. Suspension should not be an automatic response when an allegation is reported. All options to avoid  
1076 suspension should be considered prior to taking that step. The case manager must consider carefully  
1077 whether the circumstances warrant suspension from contact with children at the school or college, or  
1078 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a  
1079 child or other children at the school is/are at risk of harm, or the allegation could be considered as  
1080 gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR  
1081 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have  
1082 been involved. More information on suspension and associated process can be found in [KCSIE 2021](#)  
1083 [Part 4 page 86 – 87.](#)

#### 1084 **Supporting those involved**

1085 6.122. The welfare of a child/young person is paramount (how children should be protected and supported  
1086 is set out throughout KCSIE2021 guidance) and this will be the prime concern in terms of investigating  
1087 an allegation against a person in a position of trust. However, when an allegation or safeguarding  
1088 concern is being investigated it is likely to be a very stressful experience for the adult subject of the  
1089 investigation, and potentially for the family members. It is important that an employer offers  
1090 appropriate welfare support at such a time and recognises the sensitivity of the situation. Information  
1091 is confidential and should not ordinarily be shared with the other staff or with children or parents who  
1092 are not directly involved in the investigation. More about employers duty of care to their employees can  
1093 be found in [KCSIE2021 part 4/Duty of care.](#)

1094 6.123. Staff whom allegation/s have been made against must always be supported and if suspended they  
1095 will receive a support person (nominated contact), any suspension is not an indication of guilt.

#### 1096 **Allegation outcomes**

1097 6.124. The definitions that should be used when schools and colleges determine the outcome of an allegation  
1098 are set out below:

- 1099
- Substantiated: there is sufficient evidence to prove the allegation;
  - 1100
  - Malicious: there is sufficient evidence to disprove the allegation and there has been a  
1101 deliberate act to deceive or cause harm to the person subject of the allegation;
  - 1102
  - False: there is sufficient evidence to disprove the allegation;
  - 1103
  - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.  
1104 The term, therefore, does not imply guilt or innocence; or
  - 1105
  - Unfounded: to reflect cases where there is no evidence or proper basis which supports  
1106 the allegation being made.

1107 6.125. It should be noted that these definitions are available to support the decision-making process.  
1108 However, in certain cases, in the absence of any substantiating evidence, the Company may still  
1109 progress through the formal disciplinary procedure if there are reasonable grounds to do so, or there  
1110 is a reasonable belief that an employee has committed an act of misconduct.

1111 6.126. Ultimately the options open to the school depend on the nature and circumstances of the allegations  
1112 and the evidence and information available. This will range from taking no further action, to dismissal  
1113 or a decision not to use the person's services in future. Suspension should not be the default position,



1114 an individual should be suspended only if there is no reasonable alternative ([see paragraphs 361-368](#)  
1115 [on suspension](#)).

### 1116 **Serious incident reporting**

1117 6.127. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported  
1118 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

### 1119 **Death of someone in our care including rapid response to unexpected death**

1120 6.128. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the  
1121 rapid response process described below:

#### 1122 • **Call the Ambulance and Police**

1123 • Unless the 999 operator tells you to, do not touch the person, do not move anything around them  
1124 which may form part of forensic evidence. Police will make a decision about the forensic  
1125 examinations and appropriate security of the scene.

1126 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI) reporting  
1127 procedure. The DSL will contact the Managing Director of the division they work in and verbally  
1128 inform them of what happened before completing SUI Part 2.

1129 • DSL will contact Children's/Adults Social Care Team

1130 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health Services  
1131 (CAMHS) should also be notified by the Safeguarding Authority.

1132 6.129. Once the above rapid steps have been taken, further steps described below must be followed.

1133 6.130. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the  
1134 following within 24 hours:

1135 • Chief Operating Officer, Managing Director, Responsible/Nominated Individual, Regional Manager  
1136 following the **35.01. Caretech Children's services SUI process.**

1137 • Next of kin/parents/carer of the deceased.

1138 • Where the death of an individual occurs in an education location the assistance of the local police  
1139 and social services department should be sought in informing the parents/guardians.

1140 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn

1141 • Ministry of justice if applicable.

1142 • The placing authority/authorities.

1143 • The local authority responsible for Social Services and Education (where the death takes place in a  
1144 registered school) within whose area the education location is situated.

1145 • The District Health Authority within whose area the education location is situated.

1146 • The Department for Education, (where the death takes place in a registered school).

1147 • The Health and Safety Executive.

### 1148 **Abuse of position of trust**

1149 6.131. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,  
1150 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the  
1151 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a  
1152 position of trust, even if the relationship is consensual. This means that any sexual activity between a



1153 member of the staff and a young person under 18 may be a criminal offence, even if that young person  
1154 is over the age of consent.

#### 1155 Visitors

1156 6.132. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all  
1157 times. All unauthorised visitors will be challenged by staff and reported to the home  
1158 manager/head/principal before entry is authorised.

#### 1159 Volunteers

1160 6.133. Volunteers undergo checks commensurate with their work in the home/school/college and contact  
1161 with children, young people and adults i.e. if they are in regulated activity or not.

#### 1162 Contractors

1163 6.134. We will check the identity of all contractors working on site and requests the full range of DBS and other  
1164 required checks where they work in regulated activity or unsupervised in accordance with the latest  
1165 government guidance.

#### 1166 Use of school premises for non-school/college activities

1167 6.135. Where governing bodies or proprietors hire or rent out school facilities/premises to organisations or  
1168 individuals (for example to community groups, sports associations, and service providers to run  
1169 community or extra-curricular activities) they should ensure that appropriate arrangements are in place  
1170 to keep children safe. More information can be found in [KCSIE2021 Part 2 para 155 & 156](#).

#### 1171 Extended school and off-site arrangements

1172 6.136. Where extended off-site activities are provided by and managed by us, our safeguarding policy and  
1173 procedures apply. If other organisations provide services or activities on our site we will check that they  
1174 have appropriate policies and procedures in place, including safer recruitment procedures and clarify  
1175 whose procedure is to be followed if there are concerns. There will be clear communication channels  
1176 to ensure the DSL is kept appropriately informed.

1177 6.137. When our Individuals are doing off-site activities, including day and residential visits and work related  
1178 activities, we will risk assess and check that effective safeguarding arrangements are in place. The  
1179 DSL will be kept appropriately informed.

#### 1180 Use of mobile phones

1181 6.138. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media  
1182 access including **Pro 01. Mobile Telephony Policy** at all times.

1183 6.139. All computer equipment and internet access within the home/school/college is subject to 'parental  
1184 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social  
1185 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons

1186 during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting  
1187 the many learning and social opportunities available through the internet and social media.

1188 6.140. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST  
1189 neither mention Cambian Great Dunmow School or refer to their employment at the school. Staff are  
1190 advised not to communicate with parents, guardians, carers or Individuals via social networking sites

### 11 Photography and images

1192 6.141. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1193 6.142. The vast majority of people who take or view photographs or videos of Individuals do so for entirely  
1194 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people  
1195 through taking or using images, so we have some safeguards in place.

1196 6.143. To protect our children, young people or young adults we will:

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

### 12 Physical intervention and use of reasonable force

1207 6.144. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are  
1208 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**  
1209 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,  
1210 recorded and monitored.

### 13 Staff Taking Medication or other substances

1212 6.145. Staff members must not be under the influence of alcohol or any other substance which may affect  
1213 their ability to care for the Individuals. If they are taking medication they should seek medical advice  
1214 and inform the Home Manager/Head/Principal who will review the medical advice and take a decision  
1215 as to whether they are fit for work.

1216 6.146. We only allow staff to work if medical advice confirms that their ability to look after Individuals is unlikely  
1217 to be impaired. Should a member of staff need to bring their medication to the home/school/college,  
1218 it must be securely stored and out of reach of all children, young people and young adults. This section  
1219 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

### 14 Information for individuals and relatives/carers

1221 6.147. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be  
1222 dealt with independently and that they will be kept involved in the process to the degree that they wish  
1223 to be. They will be reassured that they will receive help and support in acting.

1224 6.148. They will also be advised that they can nominate an advocate or representative to speak and act on  
1225 their behalf if they wish. For individuals assessed as lacking capacity to make decisions about how  
1226 they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and  
1227 may be appointed. They will be advised of rights to legal aid in where appropriate to victim support  
1228 and compensation.

### 15 Recruitment and vetting

1230 6.149. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**  
1231 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

- 1232 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting  
1233 schools should read the whole KCSIE2021 guidance including Part 3 dedicated to Safer Recruitment.
- 1234 6.150. Each Education location maintains a **Single Central Record (SCR)**. This covers all staff including supply  
1235 teaching and teacher trainees, agency care staff as well as multisite managers and members of the  
1236 proprietor body. This is regularly audited by the school/college SLT and available for inspection.
- 1237 6.151. For agency workers we obtain written confirmation that all checks have been completed, in line with  
1238 safer recruitment from the employment business that is supplying the member of agency staff. All  
1239 Locations must ensure that an agreement exists between the Location and the agency to confirm that,  
1240 in the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate  
1241 before that person can begin work at the home/school/college.
- 1242 6.152. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the  
1243 agency.
- 1244 6.153. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to  
1245 the same recruitment regulations and procedures as the education staff.

### 1246 Requirements to inform Disclosure and Barring Services (DBS)

- 1247 6.154. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on  
1248 the barred lists is required.
- 1249 6.155. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one  
1250 month after leaving the Location) if a person in regulated activity has been dismissed or removed due  
1251 to safeguarding concerns, or would have been had they not resigned.
- 1252 6.156. In the case of a member of teaching staff at a school or sixth form college, the case manager must  
1253 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching  
1254 ([paragraph 143 for further information](#)).
- 1255 6.157. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,  
1256 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she  
1257 is considered unsuitable to work with children and young people.
- 1258 6.158. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is  
1259 provided at paragraph 179.
- 1260 6.159. All Managers must read the Group leavers policy – all referrals must be recorded with HR so they can  
1261 ensure any future references are correct. The references team log referrals so this can be completed.  
1262 This will apply to both: DBS and TRA.

### 1263 Record-keeping

- 1264 6.160. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse  
1265 is made, staff must keep clear and accurate records using a Concern Form.
- 1266 6.161. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded  
1267 in writing. Information should be kept confidential and stored securely. It is good practice to keep  
1268 concerns and referrals in a separate child protection file for each child. Schools/colleges using  
1269 Behaviour Watch have Concern/Safeguarding function to record any concerns being raised. A report  
1270 per child/young person can also be generated.
- 1271 6.162. Records should be factual, accurate, concise, ethical and relevant.
- 1272 6.163. All recording of written information should be legible and discussions with other professionals and  
1273 agencies should be recorded chronologically.
- 1274 6.164. There will be a safeguarding section/folder for each Individual which will hold any  
1275 concerns/safeguarding documentation for that individual. At the front of each folder there is an Index  
1276 for Individual's Concerns. This is to enable the location to keep accurate records of any concerns raised

1277 regarding the individual and aid the monitoring/ reviewing of safeguarding incidents. The folders  
1278 should be kept in a secure location.

1279 6.165. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**  
1280 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding  
1281 information where the concern has escalated. Where this is held as a paper version this is to be made  
1282 into a bound booklet and completed by the DSL. If kept electronically, access is to be restricted to the  
1283 DSL and deputies only. In either case this should be kept in a secure location.

## 12 Monitoring

1285 6.166. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are  
1286 recorded, managed and responded to at the Location, at a regional level and at a whole divisional  
1287 level, see **section 9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key  
1288 Performance Indicators (KPIs) using **CambianKPI** and the identification and management of  
1289 safeguarding risks. A report on the position of every site in relation to their KPIs is produced every  
1290 Wednesday.

## 12 Training

1292 6.167. All staff will receive information regarding Child Protection and Safeguarding on induction. The  
1293 induction introduces the new staff member to the policy, procedure and practice at the location. They  
1294 will also be orientated as to where to find information regarding safeguarding including relevant  
1295 posters around the location. As part of their induction all staff are required to read this policy and  
1296 confirm that they understand their role in safeguarding and protecting young people within the service  
1297 they are going to work.

1298 6.168. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must  
1299 be completed as part of staff member induction and annually thereafter. This should include online  
1300 safety. This is to maintain staff awareness of their responsibilities in relation to children /young  
1301 people/young adult's safeguarding.

1302 6.169. Staff will not be allowed to work with Individuals unless they have completed the above training. The  
1303 school/college/home must check that supply/agency staff have completed basic awareness training  
1304 before being allowed into contact with Individuals.

1305 6.170. Contractors and others on site who might have unsupervised access to Individuals must also complete  
1306 basic awareness training before being allowed to start work.

1307 6.171. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and  
1308 practice throughout the year. This can be undertaken in various forums: as a face to face or online  
1309 session, staff meetings or workshops. In addition to this safeguarding updates are provided to schools  
1310 and colleges by the external Safeguarding Network.

1311 6.172. The DSL and DSL Deputies should undergo the same level of training providing them with the  
1312 knowledge and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided  
1313 by the LA within the boundaries they operate and be refreshed at least every two years. Both should  
1314 also undertake Prevent awareness training.

## 13 Confidentiality and information sharing

1316 6.173. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting  
1317 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear  
1318 powers to share, hold and use information for these purposes. Staff should be proactive in sharing  
1319 information as early as possible to help identify, assess and respond to risks or concerns about the  
1320 safety and welfare of children/ young people whether this is when problems are first emerging, or  
1321 where a child is already known to local authority children's social care.

1322 6.174. Where the police are involved, wherever possible the school should ask the police to obtain consent  
1323 from the individuals involved to share their statements and evidence for use in the employer's

- 1324 disciplinary process. This should be done as their investigation proceeds and will enable the police to  
1325 share relevant information without delaying the conclusion of their investigation or any court case.
- 1326 6.175. The Safeguarding authority should adopt a similar procedure when making enquiries to determine  
1327 whether the child or children named in the allegation are in need of protection or services, so that any  
1328 information obtained in the course of those enquiries which is relevant to a disciplinary case can be  
1329 passed to the employer without delay.
- 1330 6.176. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the  
1331 following:
- 1332 • who needs to know and exactly what information can be shared;
  - 1333 • how to manage speculation, leaks and gossip
  - 1334 • what, if any, information can be reasonably given to the wider community to reduce  
1335 speculation; and
  - 1336 • how to manage press interest if, and when, it should arise.
- 1337 6.177. Exchange or disclose of personal information with other agencies will be completed in accordance with  
1338 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation  
1339 including the Data Protection Act 2018 and GDPR which places duty on organisations and individuals  
1340 to process personal information fairly and lawfully and to keep the information they hold safe and  
1341 secure.
- 1342 6.178. Information relating to individual Safeguarding cases is confidential, although some information can  
1343 be shared with relevant staff. This should be done only on a 'need to know' basis.
- 1344 6.179. Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data  
1345 protection principles, which allow them to share (and withhold) personal information, as provided for  
1346 in the Data Protection Act 2018 and the GDPR. This includes:
- 1347 • being confident of the processing conditions which allow them to store and share information for  
1348 safeguarding purposes, including information which is sensitive and personal, and should be  
1349 treated as 'special category personal data'.
  - 1350 • understanding that 'safeguarding of children and individuals at risk' is a processing condition that  
1351 allows practitioners to share special category personal data. This includes allowing practitioners to  
1352 share information without consent where there is good reason to do so, and that the sharing of  
1353 information will enhance the safeguarding of a child in a timely manner but it is not possible to gain  
1354 consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent  
1355 would place a child at risk.
  - 1356 • for schools, not providing pupils' personal data where the serious harm test under the legislation is  
1357 met. For example, in a situation where a child is in a refuge or another form of emergency  
1358 accommodation, and the serious harms test is met, they must withhold providing the data in

- 1359 compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in  
1360 doubt schools should seek independent legal advice.
- 1361 6.180. When sharing safeguarding information regarding an individual, staff will need to consider the  
1362 following:
- 1363 • Information should only be shared on a 'need to know' basis when it is in the best interests of the  
1364 individual
  - 1365 • Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse  
1366 or neglect, it may be necessary to override the requirement
  - 1367 • Distinguish fact from opinion
  - 1368 • Ensure you are giving the right information about the right person
  - 1369 • Ensure you are sharing information securely
  - 1370 • Inform the person that the information has been shared if they were not already aware of this and  
1371 if it would not create or increase risk of harm to them/others.
- 1372 6.181. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of  
1373 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the  
1374 need to safeguard and promote the welfare and protect the safety of children.
- 1375 6.182. Further details on information sharing can be found in:
- 1376 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to  
1377 information sharing
  - 1378 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children, Young  
1379 People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
  - 1380 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from  
1381 the department
  - 1382 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity,  
1383 including compliance with the GDPR.
- 1384 6.183. The following wording is to be added to any covering letter where we are sharing documentation:
- 1385 *"The material contained in this letter and its enclosures are confidential to Cambian Group and the persons  
1386 named within the documentation. The documentation is delivered only in accordance with a perceived  
1387 legal obligation to make the documentation available and upon the strict understanding that the  
1388 recipient and all members of the recipient's staff will undertake to preserve confidentiality and not in  
1389 any way share the documentation or any details of the information therein contained with any other  
1390 party. Any person receiving this information who breaches these obligations of confidentiality will be*



1391 *held strictly responsible and will be expected to indemnify Cambian Group and any persons named*  
1392 *within the documentation against any losses that may arise as a result of misuse of this material”.*

1393 6.184. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details  
1394 for the Caldicott Guardian at our location is Sarah Longley Cook- Clinical Director

1395 6.185. Failure to follow this policy and local procedure may result in disciplinary action.

### 1396 **Complaints and Monitoring**

1397 6.186. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**  
1398 **procedure**, with reference to the our Designated Safeguarding Officer who is **James Dunn** (DSL) and  
1399 [Great Dunmow County Council] Safeguarding Children’s Board

## 1400 **7. Accountability**

1401 7.1. James Nunn is the DSL at Cambian Great Dunmow School and has lead responsibility for protecting  
1402 and safeguarding children, young people and young adults and liaising with the local authority and  
1403 other local agencies as appropriate. This includes young person protections, referrals, raising  
1404 awareness, training, allocating resources and supporting/directing staff within the Location. In all  
1405 matters relating to young person protection and safeguarding the school will follow the procedures  
1406 outlined in this policy.

1407 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring  
1408 by the Head of Service. Our Managing Director, Andrew Sutherland will undertake a full annual review  
1409 of the content and effective application of this policy and associated procedures. The date for the next  
1410 scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes  
1411 in legislation, regulatory requirements or as a result of best practice guidance.

1412 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director  
1413 Compliance, who will support and promote the development of initiatives to improve the prevention,  
1414 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is  
1415 also responsible for reporting on safeguarding and providing executive leadership.

1416 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those  
1417 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect  
1418 can be stressful and distressing for staff.

1419 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers,  
1420 doctors, allied health professionals and nurses) should understand how their professional standards  
1421 and requirements underpin their organisational roles to prevent, recognise and respond to abuse and  
1422 neglect.

1423 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level  
1424 need to share a common view of what types of behaviour may be abuse or neglect and what should  
1425 be an initial response to suspicion or allegation of abuse or neglect.

1426 7.7. All staff **MUST** make sure that they have familiarised themselves with their local multi-agency  
1427 safeguarding policy as this policy is designed to complement rather than replace the multi-agency  
1428 policies which define the local practice that must be followed.

1429 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable  
1430 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access  
1431 contact names and details if required.

## 1432 **8. Further Safeguarding information – what everyone need to know (Appendix** 1433 **11)**

1434 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm.  
1435 Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education  
1436 and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be

1437 signs that children are at risk. Other safeguarding issues such as peer on peer (child on child) abuse  
1438 all staff should be aware of are explored in the **Appendix 11. Further Safeguarding information – what**  
1439 **everyone need to know.**

## 1440 9. Appendices

### 1441 Appendix 1: Relevant policies and documents

- 1442 1. Child Protection and Safeguarding
- 1443 a) 25.01 - Index Form for Individuals Concern File
- 1444 b) 25.02 - Abuse Poster Individual
- 1445 c) 25.03 - Individual Safeguarding booklet – Easy Read
- 1446 d) 25.04 - Concern Form
- 1447 e) 25.05 - Safeguarding Tracking Pack
- 1448 f) 25.06 – Visitor Information Leaflet template
- 1449 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
- 1450 h) 25.08 – Guidance to staff who had an allegation made against them
- 1451 i) 25.09 – Local Safeguarding procedure
- 1452 j) 25.10 – Staff Safeguarding Information poster
- 1453 k) 25.11 – Guidance notes for Designated or On call person
- 1454 l) 25.12 – Static body chart
- 1455 m) 25.13 – Weekly body chart
- 1456 n) 25.14 – Guidance for Investigating Unexplained Body Marks
- 1457 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
- 1458 2. Whistleblowing
- 1459 3. Anti-bullying
- 1460 4. Child Sexual Exploitation
- 1461 5. Intimate and Invasive Care
- 1462 6. Self-harm and suicide
- 1463 7. Behaviour Support
- 1464 8. Physical Intervention
- 1465 9. Complaints Policy
- 1466 10. Health
- 1467 11. E –safety
- 1468 12. Capacity to consent
- 1469 13. Prevent

- 1470 **14.** Recruitment
- 1471 **15.** Code of Conduct
- 1472 **16.** Data Protection
- 1473 **17.** Confidentiality
- 1474 **18.** E- safety
- 1475 **19.** Disciplinary
- 1476 **20.** Complaints
- 1477 **21.** Code of Practice
- 1478 **22.** Mobile telephony
- 1479 **23.** SUI Caretech children’s services process
- 1480 **24.** Caretech - Group Leaving Policy
- 1481 **25.** GHR 02 – Harassment and Bullying
- 1482 **26.** GHR 41 – Reference Requests
- 1483 **27.** GHR 41.1 DBS referral log
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**Appendix 2: Legislation and guidance**

- 1509 • [The Children Act 2004, as amended by the Children and Social Work Act 2017](#)
- 1510 • [Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes \(England\) Regulations 2015 in force as of 1st April 2015](#)
- 1511
- 1512 • [Guide to the Young people's/care home Homes Regulations including the Quality Standards \(DfE: April 2015\)](#)
- 1513
- 1514 • This policy is also in accordance with the Local Safeguarding Young people Board (LSCP) locally agreed inter-agency safeguarding processes and procedures
- 1515
- 1516 • [Prevent Duty Guidance: for England and Wales \(March 2015\) \(Prevent\). Prevent is supplemented by The Prevent duty: Departmental advice for schools and young person minders \(June 2015\) and The use of social media for on-line radicalisation \(July 2015\)](#)
- 1517
- 1518
- 1519 • [The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2015](#)
- 1520 • [Female Genital Mutilation Act 2003, \(as inserted by section 74 of the Serious Crime Act 2015\)](#)
- 1521 • [Terrorism Act 2000](#)
- 1522 • [Counter Terrorism and Security Act 2015](#)
- 1523 • [The School staffing regulations, England 2009](#)
- 1524 • [The Teachers Disciplinary regulations, 2012](#)
- 1525 • [Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.](#)
- 1526 • [All Wales Child Protection Procedures 2008](#)
- 1527 • [All Wales POVA Guidance 2008](#)
- 1528 • [Keep learners Safe 2015](#)
- 1529 • [The Care Act 2014](#)
- 1530 • [Social services and wellbeing Act 2014](#)
- 1531 • [Working Together to Safeguard Children 2018](#)
- 1532 • [Keeping children safe in Education 2021](#)
- 1533 • [Keeping children safe in education - part one 2021](#)
- 1534 • [Regulated activity in relation to children: scope](#)
- 1535 • [What to do if you're worried a child is being abused](#)
- 1536 • [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- 1537 • [Violence against women and girls](#)
- 1538 • <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>
- 1539 • [Teaching online safety in school.pdf](#)

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1605 **Appendix 4: Types of abuse – children**

- 1606 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm  
1607 or by failing to act to prevent harm. Children may be abused in a family or in an institutional or  
1608 community setting by those known to them or, more rarely, by others. Abuse can take place wholly  
1609 online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or  
1610 adults or by another child or children
- 1611 • **Physical abuse:** a form of abuse which may involve hitting, slapping, shaking, throwing, poisoning,  
1612 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical  
1613 harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces,  
1614 illness in a child.
- 1615 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and  
1616 adverse effects on the child’s emotional development. It may involve conveying to a child that they are  
1617 worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It  
1618 may include not giving the child opportunities to express their views, deliberately silencing them or  
1619 ‘making fun’ of what they say or how they communicate. It may feature age or developmentally  
1620 inappropriate expectations being imposed on children. These may include interactions that are beyond  
1621 a child’s developmental capability as well as overprotection and limitation of exploration and learning,  
1622 or preventing the child participating in normal social interaction. It may involve seeing or hearing the  
1623 ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children  
1624 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of  
1625 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1626 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for  
1627 example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching  
1628 outside of clothing. They may also include non-contact activities, such as involving children in the  
1629 production of sexual images, forcing children to look at sexual images or watch sexual activities,  
1630 encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for  
1631 abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can  
1632 also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children  
1633 is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should  
1634 be aware of it and of their school or colleges policy and procedures for dealing with it,
- 1635 • **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an  
1636 individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child  
1637 into taking part in sexual or criminal activity, in exchange for something the victim needs or wants,  
1638 and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through  
1639 violence or the threat of violence. CSE and CCE can affect children, both male and female and can  
1640 include children who have been moved (commonly referred to as trafficking) for the purpose of  
1641 exploitation Child Sexual Exploitation does not always involve physical contact; it can also occur through  
1642 the use of technology.
- 1643 • **Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to  
1644 result in the serious impairment of the child’s health or development. Neglect may occur during  
1645 pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent  
1646 or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or  
1647 abandonment); protect a child from physical and emotional harm or danger; ensure adequate  
1648 supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care  
1649 or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- 1650 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through  
1651 social media, online games or other channels of digital communication. Children can also be re-  
1652 victimised if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number  
1653 of illegal abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour;  
1654 child sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual  
1655 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using  
1656 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that  
1657 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as  
1658 inappropriate behaviours or content online. For instance, children may be bullied online by their peers  
1659 or they might, either accidentally or intentionally, view content which is intended for adults. Both online



1660 abuse and exposure to unsuitable content or behaviour can have a long-lasting impact on the  
1661 wellbeing of children and young people.

1662 **Appendix 5: Types of abuse - adults**

- 1663 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough  
1664 handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint,  
1665 making someone purposefully uncomfortable, involuntary isolation or confinement, misuse of  
1666 medication, forcible feeding or withholding food, unauthorized restraint, restricting movement.
- 1667 • **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend  
1668 the honour of the family and/or the community including female genital mutilation (FGM), forced  
1669 marriage and practices such as breast ironing. Abuse committed in the context of preserving “honour”  
1670 often involves a wider network of family or community pressure and can include multiple perpetrators.  
1671 It is important to be aware of this dynamic and additional risk factors when deciding what form of  
1672 safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be  
1673 handled and escalated as such. Professionals in all agencies, individuals and groups in relevant  
1674 communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered  
1675 HBA.
- 1676 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse  
1677 outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic  
1678 violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening  
1679 behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners  
1680 or family members regardless of gender or sexuality.
- 1681 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non-  
1682 consensual masturbation of either or both persons, non- consensual sexual penetration or attempted  
1683 penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to  
1684 consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual  
1685 photography or forced use of pornography or witnessing of sexual acts, Indecent exposure.
- 1686 • **Sexual harassment**- unwanted conducts of a sexual nature that can occur online and offline, sexual  
1687 harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or  
1688 humiliated, and/or create a hostile, offensive or sexualised environment.
- 1689 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing  
1690 services, educational and social opportunities and seeing friends, removing mobility or communication  
1691 aids or intentionally leaving someone unattended when they need assistance, preventing someone  
1692 from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure  
1693 to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion,  
1694 harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a  
1695 patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- 1696 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from  
1697 accessing their own money, benefits or assets, employees taking a loan from a person using the  
1698 service, undue pressure, duress, threat or undue influence put on the person in connection with loans,  
1699 wills, property, inheritance or financial transactions, arranging less care than is needed to save money  
1700 to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance  
1701 to access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments  
1702 in a family home, someone moving into a person’s home and living rent free without agreement or  
1703 under duress, false representation, using another person’s bank account, cards or documents,  
1704 exploitation of a person’s money or assets, e.g. unauthorised use of a car, misuse of a power of  
1705 attorney, deputy, appointeeship or other legal authority.
- 1706 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as  
1707 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that  
1708 realistically they never will be able to.
- 1709 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage  
1710 and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation  
1711 (known as ‘protected characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks  
1712 or inappropriate use of language related to a protected characteristic, denying access to  
1713 communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or  
1714 deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare,

- 1715 education, employment and criminal justice relating to a protected characteristic, substandard service  
1716 provision relating to a protected characteristic.
- 1717 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-  
1718 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership  
1719 and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and  
1720 disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect  
1721 for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate  
1722 food and drink, or assistance with eating, not offering choice or promoting independence, misuse of  
1723 medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of  
1724 individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference  
1725 with personal correspondence or communication, failure to respond to complaints.
  - 1726 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,  
1727 stimulation and activity, personal or medical care, providing care in a way that the person dislikes,  
1728 failure to administer medication as prescribed, refusal of access to visitors, not taking account of  
1729 individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational  
1730 needs, ignoring or isolating the person, preventing the person from making their own decisions,  
1731 preventing access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
  - 1732 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of  
1733 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,  
1734 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise  
1735 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more  
1736 appropriate under the parts of the Care Act dealing with assessment, planning, information and  
1737 advice, and prevention.  
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## 174 Appendix 6: Signs that someone could be a victim

### 1744 Physical abuse

- 1745 • No explanation for injuries or an inconsistent account of what happened
- 1746 • Injuries that don't seem likely, given the person's lifestyle
- 1747 • Bruising, cuts, welts, burns, marks on the body or loss of hair in clumps
- 1748 • Frequent injuries
- 1749 • Unexplained falls
- 1750 • Subdued or changed behaviour in the presence of a particular person
- 1751 • Signs of malnutrition (not having enough to eat)
- 1752 • Failure to seek medical treatment or frequent changes of GP

### 1753 Sexual abuse

- 1754 • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- 1755 • Torn, stained or bloody underclothing
- 1756 • Bleeding, pain or itching in the genital area
- 1757 • Unusual difficulty in walking or sitting
- 1758 • Foreign bodies in genital or rectal openings
- 1759 • Infections, unexplained genital discharge, or sexually transmitted diseases
- 1760 • Pregnancy in a child or young person who cannot consent to sexual intercourse
- 1761 • Using unexpectedly explicit sexual language
- 1762 • Major changes in sexual behaviour or attitude
- 1763 • Incontinence not to do with a medical condition
- 1764 • Self-harming
- 1765 • Poor concentration, withdrawal, sleep disturbance
- 1766 • Excessive fear of or withdrawal from relationships
- 1767 • Fear of receiving help with personal care
- 1768 • Not wanting to be alone with a particular person

### 1769 Psychological or emotional abuse

- 1770 • An air of silence when a particular person is present
- 1771 • Withdrawal or change in the psychological state of the person
- 1772 • Insomnia (not sleeping)
- 1773 • Low self-esteem
- 1774 • Uncooperative and aggressive behaviour
- 1775 • A change of appetite, weight loss or gain
- 1776 • Signs of distress: tearfulness, anger
- 1777 • Apparent false claims by someone involved with the person, to attract unnecessary treatment

### 1778 Neglect and acts of omission

- 1779 • Poor environment – dirty or unhygienic
- 1780 • Poor physical condition and/or personal hygiene
- 1781 • Pressure sores or ulcers
- 1782 • Malnutrition or unexplained weight loss
- 1783 • Untreated injuries and medical problems
- 1784 • Inconsistent or reluctant contact with medical and social care organizations
- 1785 • A build-up of medication that hasn't been taken
- 1786 • Uncharacteristic failure to engage in social interaction

1787 Unsuitable clothing or not enough clothes

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1789 **Domestic abuse**

1790 • becoming anxious or depressed

1791 • having difficulty sleeping

1792 • complaining of physical symptoms such as tummy aches

1793 • starting to wet their bed

1794 • behaving as though they are much younger than they are

1795 • having problems with school

1796 • becoming aggressive or they may internalise their distress and withdraw from other people

1797 • having a lowered sense of self-worth

1798 • older children may begin to play truant or start to use alcohol or drugs

1799 • they beginning to self-harm by taking overdoses or cutting themselves

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1801 **Peer on Peer abuse**

1802 • absence from school or disengagement from school activities

1803 • physical injuries

1804 • mental or emotional health issues

1805 • becoming withdrawn – lack of self esteem

1806 • lack of sleep

1807 • alcohol or substance misuse

1808 • changes in behavior

1809 • inappropriate behavior doe age

1810 • abusive towards others

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**Appendix 7: Signs that someone could be an abuser**

- 1845 • Using restraint when it's not needed
- 1846 • Having favourites
- 1847 • Giving treats, presents or money to certain people without permission from a manager
- 1848 • Finding ways to spend time with a particular child, young person or young adult, perhaps by working longer hours or giving up free time
- 1849
- 1850 • Finding ways to spend time alone with a particular child, young person or young adult , for example in a car or somewhere else
- 1851
- 1852 • Inviting a particular child, young person or young adult at risk to their own house without permission from a manager
- 1853
- 1854 • Being over-friendly with a child, young person or young adult's parents or guardians without permission from a manager
- 1855
- 1856 • Taking photos of the child, young person or young adult that aren't for work purposes
- 1857 • Trying to make private contact with a particular child, young person or young adult , including by text, email, mobile phone, online or in letter
- 1858
- 1859 • Finding ways to have physical contact, like play-fighting or tickling
- 1860 • Keeping collections of toys or other items that might attract children or people at risk
- 1861 • controlling behaviour
- 1862 • Narcissistic characteristics
- 1863 • bullying
- 1864 • being forced into a sexual act
- 1865 • humiliation
- 1866 • constant yelling and shouting
- 1867 • the threat or use of violence
- 1868 • destroying personal items
- 1869 • limiting contact with family, friends and work colleagues
- 1870 • checking up on your whereabouts
- 1871 • accusing the child/young person (the victim), of committing the abuse when it is the other way around.
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1889 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**  
1890 **and recording procedure**

1891 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within  
1892 1 hour from the moment of disclosure/report from the child/young person/other person, completes  
1893 and passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of  
1894 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern  
1895 is related to the staff and the Head/Principal is not available, staff must report their concern to the DSL  
1896 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal  
1897 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally  
1898 before completing the Concern/Safeguarding slip in the system.

1899 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details  
1900 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on  
1901 the Concern Form. Services using Behaviour Watch – DSL/DSL Deputy or Head/Principal reviews the  
1902 concern and decides on the next step which may lead to Safeguarding Tracking Pack being opened  
1903 (Safeguarding Tracking Pack is built as part of the concern slip should the case proceed to  
1904 safeguarding).

1905 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy  
1906 or Head/Principal will then also additionally allocate the next sequential Safeguarding Reference  
1907 number on the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern  
1908 form and immediately (or at least within one hour of receiving the concern form, make a referral to the  
1909 local Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to  
1910 discuss the allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the  
1911 Behaviour Watch system will progress to the next stage – Safeguarding part of the concern/SG slip  
1912 which is only accessible to the Safeguarding Team.

1913 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a  
1914 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on  
1915 the Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial  
1916 Informal Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy MUST ensure that a  
1917 member of their Senior Management Team is assigned to look into the concern. The review must be  
1918 recorded and outcomes shared with the people involved. Feedback from the review session MUST be  
1919 provided to local Safeguarding Authority/LADO. Services using the Behaviour Watch system will follow  
1920 the same set of steps apart from populating the Central Log of Concerns and Safeguarding as the log  
1921 can be generated by the system using chosen filtering criteria.

1922 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be  
1923 taken. This diligent approach will ensure a clear historic record of contact with local Safeguarding  
1924 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with  
1925 the local Safeguarding Authority/LADO whichever appropriate.

1926 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that  
1927 it requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack**  
1928 must be opened with the next sequential Safeguarding Reference included on the form and details as  
1929 such entered on the central log.

1930 • Services using the Behaviour Watch system – where a concern progresses to Safeguarding Tracking  
1931 Pack being opened, a one record will be created including the original concern, with the whole  
1932 document having the same slip number.

1933 • Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the  
1934 **Responsible/Nominated Individual and** in day schools - **Regional Education Manager** as a follow up to  
1935 the initial reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual**  
1936 **and Regional Education Manager** on completion, providing detailed overview of the actions taken and  
1937 the final outcome. Services using the Behaviour Watch will be able to trigger live notification to the  
1938 Regional Manager (Education/Care), Responsible/Nominated Individual and Registered Manager –



- 1939 where appropriate. The **Responsible/Nominated Individual and Regional Education Manager** in day  
 1940 schools will update relevant Directors. This original form will be saved in the Safeguarding  
 1941 file/Behaviour Watch – Concern/SG module.
- 1942 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the  
 1943 local Police should be informed immediately as well and they can take immediate protective action as  
 1944 necessary.
- 1945 • If the matter is a more general concern then ensure that the ‘Action Taken’ log on the concern form is  
 1946 completed and the form is filed within the Safeguarding file. Either way the form must be signed by  
 1947 the DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use  
 1948 Concern/Safeguarding ‘Other’ slip to record concerns which are not related to children/young people,  
 1949 staff or children/young people and staff.
- 1950 • The relevant concern form should be referenced in the Individual’s **25.01 Index form for Individual**  
 1951 **concern/safeguarding file** and the site’s **25.07 Central Log of Concerns and Safeguarding**. Services  
 1952 using Behaviour Watch will be able to filer information per chosen criteria and also generate reports  
 1953 per each child/young person in the school, college, children’s or care homes.
- 1954 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking**  
 1955 **Pack /Behaviour Watch Concern/SG module**.
- 1956 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed  
 1957 in writing that the concern is closed and Responsible/Nominated Individual and Regional Education  
 1958 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is  
 1959 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-**  
 1960 **off have been completed.** Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the  
 1961 **Safeguarding file.**
- 1962 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local  
 1963 Authority and/or the police. The individual can be kept in their care home or on the school/college site  
 1964 fully supported (e.g. if they are a day student) if advised to do so.
- 1965 • The parent/carers should be informed and a decision should be made with the Local Authority and the  
 1966 Police about what action is to be taken and whom by.
- 1967 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been  
 1968 said by others they can phone the Local Authority to discuss concerns. To do so would not constitute  
 1969 an abuse referral but may help to clarify the situation but they must record all details of any  
 1970 conversation and advice received on a concern form. He/she can then move to a formal referral or  
 1971 actively monitor the situation.
- 1972 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or  
 1973 allegation of abuse directed against anyone working within the establishment. The establishment  
 1974 **MUST** not internally investigate any allegations of abuse without first taking instruction from the local  
 1975 Safeguarding Authority/LADO.
- 1976 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal  
 1977 management investigation (level 2), the investigation process will commence.
- 1978 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the  
 1979 external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps  
 1980 to assist the external agency to ensure the investigation is completed without a delay.
- 1981 • Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within  
 1982 the time frame specified by their regulator. This is regardless of who leads on the investigation and  
 1983 whether or not the investigation has been concluded.
- 1984 • If as the result of an investigation there has been a substantiated allegation against a member of staff,  
 1985 we will work with the local Safeguarding Authority/LADO to determine whether there are any

1986 improvements to be made to our safeguarding policy, procedures and practice to prevent similar  
1987 events in the future. Also we will work with our internal Human Resources department and may  
1988 commence proceedings under **GHR 27. Disciplinary policy and procedure.**

1989 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.  
1990 Records are kept of all conversations as part of the investigation process and made available as  
1991 required.

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## Appendix 9: Key contacts

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**DSL & Headteacher** is James Nunn

Telephone 01371 859 405

Email: [james.Nunn@cambianguroup.com](mailto:james.Nunn@cambianguroup.com)

2030

**DSL Deputy** is Anna Caiger

Telephone 01371 859 405 (24hrs)

Email: [anna.caiger@cambianguroup.com](mailto:anna.caiger@cambianguroup.com)

2033

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

Telephone (24hrs)

Email:

2036

**Operations Director** is Kicha Mitchell

Telephone 07711766176

Email: [Kicha.mitchell@cambianguroup.com](mailto:Kicha.mitchell@cambianguroup.com)

2039

**Managing Director** is Andrew Sutherland

Telephone 077123 14278

Email: [Andrew.sutherland@cambianguroup.com](mailto:Andrew.sutherland@cambianguroup.com)

2042

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

Telephone: 079190232207

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

2045

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

Telephone: 01707 601 800

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

2048

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

Telephone: 07701314378

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

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### Local Safeguarding Authority

Great Dunmow Safeguarding Children Board Room C228 County Hall Chelmsford CMI 1QH

General enquiries: 0333 013 8936 [escb@GreatDunmow.gov.uk](mailto:escb@GreatDunmow.gov.uk)

Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-4:00pm

Out of hours or bank holidays, call the emergency duty team on 0345 606 1212.

Police 999

The non-emergency police telephone number is: 101.

If you have an immediate safeguarding concern call 0345 603 7627 and ask for the priority line.

Out of hours or bank holidays, call the emergency duty team on 0345 6061212

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

The Local Authority Designated Officer (LADO)

There are four LADOs for Great Dunmow County Council and they are based within the Children’s Safeguarding

Team. They can be contacted by phone on [03330 139 797](tel:03330139797) or by e-mail: [lado@GreatDunmow.gov.uk](mailto:lado@GreatDunmow.gov.uk)

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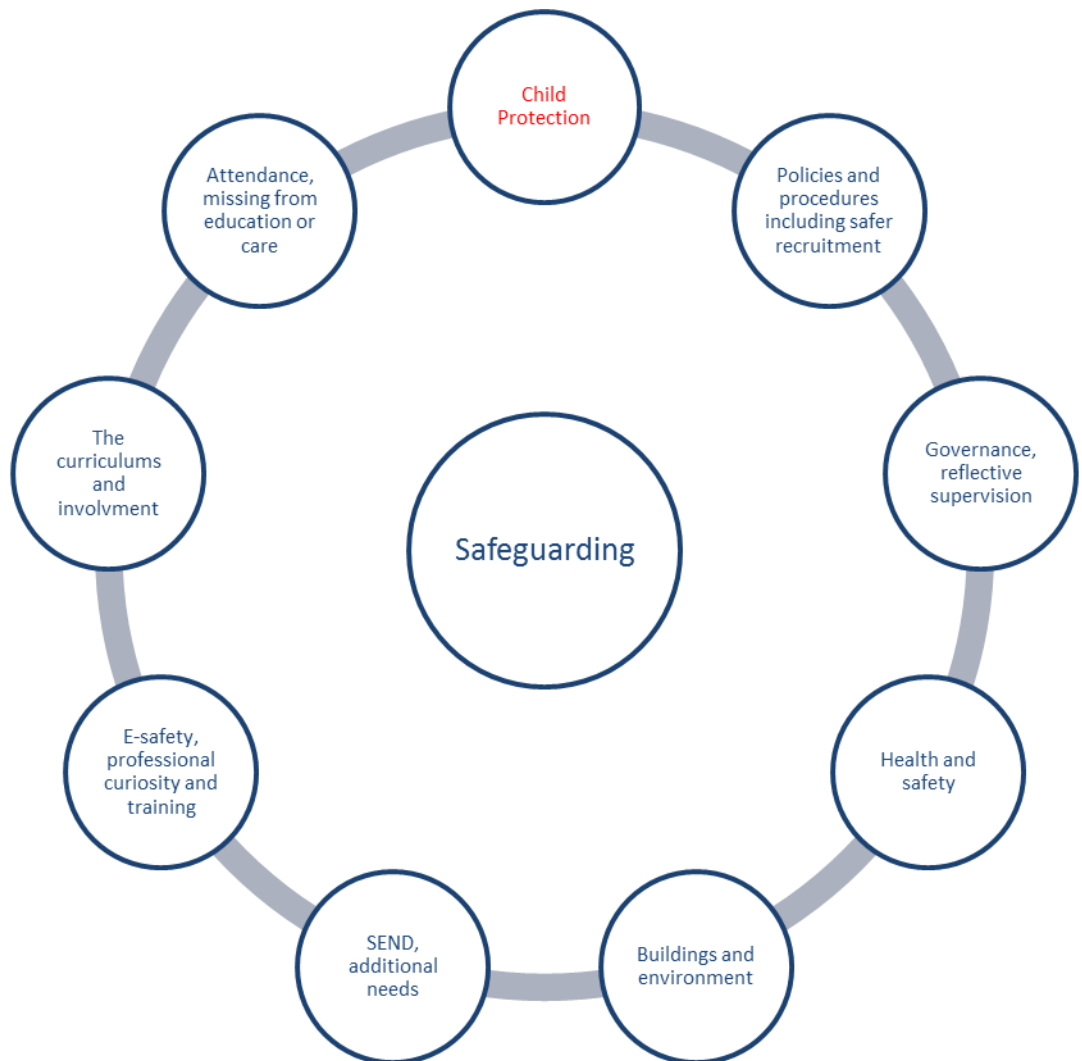
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**Appendix 10. Safeguarding in children's Services - illustration**



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

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### Contextual safeguarding

- 2115 9.1. Contextual Safeguarding is ‘an approach to understanding, and responding to, young people’s  
2116 experiences of significant harm beyond their families. It recognises that the different relationships that  
2117 young people form in their neighbourhoods, schools, colleges, children’s/care homes and online can  
2118 feature violence and abuse. Parents and carers have little influence over these contexts, and young  
2119 people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore  
2120 children’s social care practitioners need to engage with individuals and sectors who do have influence  
2121 over/within extra- familial contexts, and recognise that assessment of, and intervention with, these  
2122 spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the  
2123 objectives of child protection systems in recognition that young people are vulnerable to abuse in a  
2124 range of social contexts’.
- 2125 9.2. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors  
2126 outside the school and/or can occur between children outside of these environments. All staff, but  
2127 especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation  
2128 in situations outside their families. Extra-familial harms take a variety of different forms and children  
2129 can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal  
2130 exploitation, and serious youth violence (KCSiE2021). Further advice for schools and colleges is provided  
2131 in the [Home Office’s Preventing youth violence and gang involvement](#) and its [Criminal exploitation of  
2132 children and vulnerable adults: county lines guidance](#)
- 2133 9.3. Children’s social care assessments should consider where children are being harmed in contexts  
2134 outside the home (family home, children’s/care home), so it is important that schools, colleges and  
2135 children’s/care homes provide as much information as possible as part of the referral process. This will  
2136 allow any assessment to consider all the available evidence and enable a contextual approach to  
2137 address such harm. More information about Contextual safeguarding can be found on [NSPCC website](#).
- 2138 9.4. We will consider the various factors that have an interplay with the life of any child/young person about  
2139 whom we have concerns within the setting and the level of influence that these factors have on their  
2140 ability to be protected and remain free from harm particularly when it comes to child exploitation or  
2141 criminal activity.
- 2142 9.5. Whilst this term applies to this specific definition, the notion of considering a child/young person within  
2143 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the  
2144 school, college, children’s/care home gates, within their family home when they visit (children attending  
2145 residential education), within the family (day students) and within the community (extracurricular off

2146 site activities, events, groups and clubs) are key considerations when the DSL is looking at any  
2147 concerns.

2148 **Bullying**

2149 9.6. Our approach to bullying is set out in a separate **0.21. Anti – bullying policy and procedure**  
2150 acknowledges that to allow or condone bullying may lead to consideration under child protection  
2151 procedures. Bullying is a safeguarding matter that if left unresolved can become a child protection  
2152 matter. Our settings take seriously any bullying concerns and both investigate and take action to protect  
2153 Individuals where appropriate.

2154 **Peer on peer (child on child) abuse**

2155 9.7. Boarding schools, residential special schools, residential colleges and children’s homes and care  
2156 homes for young adults attending education (FE colleges) have additional factors to consider with  
2157 regard to safeguarding. Schools and colleges that provide such residential accommodation and/or  
2158 are registered as children’s homes should be alert to signs of abuse in such settings (for example,  
2159 inappropriate pupil or student relationships and the potential for peer on peer abuse, particularly in  
2160 schools and colleges where there are significantly more girls than boys or vice versa) and work closely  
2161 with the host local authority and, where relevant, any local authorities that have placed their children  
2162 there. All residential setting within the Organisation children’s service will continuously maintain their  
2163 communication with the internal and external Education providers to ensure the additional factors are  
2164 being considered and any concerns shared in a timely manner and with the right people.

2165 9.8. All staff should be aware that children can abuse other children (often referred to as peer on peer  
2166 abuse) and that it can happen both inside and outside of school/college/children’s/care home and  
2167 online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know  
2168 how to identify it and respond to reports. In some schools, colleges, children’s / care homes site –  
2169 based or regional members of therapy teams might need to be involved and support the SLT to identify  
2170 the most effective ways of communication with the child/young person who may have potentially been  
2171 the victim of Peer on Peer abuse and who instigated it.

2172 9.9. It must be recognised that children and young people would require varied approaches and  
2173 communication mechanisms to be present and available so they can report abuse. Children must be  
2174 regularly reassured that their concern/reports will be treated seriously every time they report it.

2175 9.10. Children needs to be told what will happen from the moment their concern is shared, so the lack of  
2176 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.  
2177 Children need to know that that their concerns will be investigated and dealt with. Child’s/young  
2178 person’s preference in terms of how feedback should be provided must be taken into consideration so  
2179 this can be planed for in advance.

2180 9.11. The communication with each child throughout the process of Peer on peer abuse investigation must  
2181 be regular, proportionate and take place using suitable communication.

2182 9.12. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn’t  
2183 receive timely and appropriate support from the school/college, hence the communication and support  
2184 must become one of the critical points of a significant priority to those responding to and those



- 2185 managing peer on peer abuse cases including those of a sexual nature. Other consideration for all  
2186 providers were:
- 2187 • to assume it is happening here and plan accordingly
  - 2188 • work on and strengthen the whole school, college, children's/care home approach to  
2189 developing a safeguarding culture
  - 2190 • to ensure staff model respectful behaviour
  - 2191 • to ensure children and young people are clear about acceptable and unacceptable behaviour
  - 2192 • to ensure children/young people are confident to ask for help
  - 2193 • to ensure carefully planned and implemented RSHE curriculum
  - 2194 • to ensure the behavioural approach with sanctions & interventions for poor behaviour
  - 2195 • to have mechanisms to support students who need it in the way they need it
  - 2196 • to ensure staff have access to suitable training & that there are clear expectation for staff and  
2197 Managers
  - 2198 • to ensure pupil's voice in heard and responded to
  - 2199 • to ensure DSLs have some protected time to engage with local safeguarding partners and  
2200 LADOs, so those relationships can be strengthen
  - 2201 • to ensure staff follow the guidance in Keeping Children Safe in Education  
2202
- 2203 9.13. All staff should understand, that even if there are no reports in their schools or colleges it does not  
2204 mean it is not happening, it may be the case that it is just not being reported. As such it is important if  
2205 staff have any concerns regarding peer on peer abuse they should speak to their DSL (or deputy).
- 2206 9.14. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and  
2207 harassment. Staff must NOT take the view that it doesn't not happen in their setting. It is essential that  
2208 all staff understand the importance of challenging inappropriate behaviours between peers, many of  
2209 which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for  
2210 example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or  
2211 "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for

- 2212 children and in worst case scenarios a culture that normalises abuse leading to children accepting it  
2213 as normal and not coming forward to report it.
- 2214 9.15. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but  
2215 that all peer on peer abuse is unacceptable and will be taken seriously. It is essential that all victims  
2216 are reassured that they are being taken seriously and that they will be supported and kept safe.
- 2217 9.16. Peer on peer abuse is most likely to include, but may not be limited to:  
2218
- 2219 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - 2220 • abuse in intimate personal relationships between peers
  - 2221 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical  
2222 harm (this may include an online element which facilitates, threatens and/or encourages physical  
2223 abuse)
  - 2224 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online  
2225 element which facilitates, threatens and/or encourages sexual violence). For further information  
2226 about sexual violence see [Annex B](#).
  - 2227 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which  
2228 may be standalone or part of a broader pattern of abuse; For further information about sexual  
2229 harassment see [Annex B](#).
  - 2230 • causing someone to engage in sexual activity without consent, such as forcing someone to strip,  
2231 touch themselves sexually, or to engage in sexual activity with a third party
  - 2232 • consensual and non-consensual sharing of nudes and semi nudes images and or videos (also  
2233 known as sexting or youth produced sexual imagery). For more information about this read UKCIS  
2234 guidance: [Sharing nudes and semi-nudes advice for education settings](#).
  - 2235 • Upskirting ( For further information about upskirting see Annex B) which typically involves taking a  
2236 picture under a person's clothing without their permission, with the intention of viewing their genitals  
2237 or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- 2238 9.17. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or  
2239 humiliation used as a way of initiating a person into a group and may also include an online element)
- 2240 9.18. Staff must be clear as to the school/college's/home's procedures with regards to peer on peer abuse  
2241 and the important role they have to play in preventing it and responding where they believe a child  
2242 may be at risk from it.
- 2243 9.19. All Individuals will be provided with safeguarding information in a format which is appropriate for their  
2244 understanding and communication. This may take the form of posters or a leaflet/booklet.
- 2245 9.20. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing  
2246 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be  
2247 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.  
2248 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated  
2249 or acceptable. However, it is critical to state that some children with cognitive impairment may not be  
2250 able to fully understand how children on the receiving end of such behaviour may feel, therefore staff  
2251 will work with each of the children affected by the situation in order to enhance their understanding of  
2252 the seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.
- 2253 **Serious violence**
- 2254 9.21. All staff should be aware of the indicators, which may signal children are at risk from, or are involved  
2255 with serious violent crime. These may include increased absence from school, a change in friendships  
2256 or relationships with older individuals or groups, a significant decline in performance, signs of self-  
2257 harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts

- 2258 or new possessions could also indicate that children have been approached by, or are involved with,  
2259 individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 2260 9.22. All staff should be aware of the range of risk factors which increase the likelihood of involvement in  
2261 serious violence, such as being male, having been frequently absent or permanently excluded from  
2262 school, having experienced child maltreatment and having been involved in offending, such as theft or  
2263 robbery. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence  
2264 and gang involvement and its [Criminal exploitation of children and vulnerable adults: county lines  
2265 guidance](#).
- 2266 9.23. Sexual violence and sexual harassment between children can occur between two children of **any age  
2267 and sex from primary to secondary stage and into colleges. It can also occur online**. It can also occur  
2268 through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2269 9.24. Children who are victims of sexual violence and sexual harassment will likely find the experience  
2270 stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and  
2271 will be exacerbated if the alleged perpetrator(s) attends the same school or lives in the same  
2272 children’s/care home. Sexual violence and sexual harassment exist on a continuum and may overlap,  
2273 they can occur online and face to face (both physically and verbally) and are never acceptable. All staff  
2274 working with children are advised to maintain an attitude of ‘it could happen here’.
- 2275 9.25. It is essential that all victims are reassured that they are being taken seriously and that they will be  
2276 supported and kept safe. **A victim should never be given the impression that they are creating a  
2277 problem by reporting sexual violence or sexual harassment**. Nor should a victim ever be made to feel  
2278 ashamed for making a report.
- 2279 9.26. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential  
2280 that victims are protected, offered appropriate support and every effort is made to ensure their  
2281 education is not disrupted. It is also important that other children, adult students and school and  
2282 college staff are supported and protected as appropriate.
- 2283 9.27. There is support available for schools and colleges. Paragraph 52 and Annex A in the [Sexual  
2284 Violence and Sexual Harassment Between Children in Schools and Colleges](#) advice provides detailed  
2285 information and links to resources.
- 2286 9.28. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children  
2287 with special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2288 9.29. Staff should be aware of the importance of:
- 2289 • challenging inappropriate behaviours;
  - 2290 • making clear that sexual violence and sexual harassment is not acceptable, will never be  
2291 tolerated and is not an inevitable part of growing up;
  - 2292 • not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of  
2293 growing up”, “just having a laugh” or “boys being boys”; and
  - 2294 • challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms,  
2295 breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or  
2296 tolerating such behaviours risks normalising them.
- 2297 9.30. Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected  
2298 to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour  
2299 is developmentally inappropriate and may cause developmental damage. An umbrella term for these  
2300 types of behaviour are often referred to as **“harmful sexual behaviour”**. The term has been widely  
2301 adopted in child protection. Harmful sexual behaviour can occur online and/or offline and can also

- 2302 occur simultaneously between the two. Harmful sexual behaviour should be considered in a child  
2303 protection context.
- 2304 9.31. Situations where children/young people are forced or coerced into sexual activity by peers or  
2305 associates can be related with gang / serious youth violence activity but that is not always the case.  
2306 Peer influence or peer pressure is a major factor in the decisions made by young people to join  
2307 particular groups. Many young people see it as a “way out” from their day to day life and feel a strong  
2308 bond with their peers, one which they may be lacking at home. Examples of peer-on-peer abuse  
2309 including sexualised online bullying include:
- 2310 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that  
2311 makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their  
2312 colour, ethnicity, culture, faith community, national origin or national status.
  - 2313 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality or gender  
2314 is used as a weapon by boys or girls, this may also include any of the following:
    - 2315 - spreading rumors about someone's alleged sex life
    - 2316 - using offensive terms to describe a person
    - 2317 - inappropriate touching or attempts to do so
    - 2318 - non-consensual sharing of sexual images and videos
    - 2319 - unwanted sexual comments and messages, including those on social media
    - 2320 - any sexual exploitation, coercion and threats
    - 2321 - sexual assault and rape
  - 2322 • **Upskirting** - taking a picture under a person’s clothing without their permission and /or knowledge,  
2323 with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual  
2324 gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of  
2325 any gender, can be a victim The Voyeurism Offences Act, which was commonly known as the  
2326 Upskirting Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.
  - 2327 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are  
2328 transgender, thought to be transgender, or whose gender expression doesn’t conform to traditional  
2329 gender roles. Transphobia can prevent transgender and gender nonconforming people from living  
2330 full lives free from harm.
  - 2331 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived sexual  
2332 orientation);
  - 2333 • **Disablist Bullying** - targets a young person solely based on their disability. This can include  
2334 manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a  
2335 certain aspect of the victim’s disability.
  - 2336 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect attitude (usually  
2337 negative) towards an individual based solely on the individual's membership of a social group. For  
2338 example, a person may hold prejudiced views towards a certain race or gender etc. (e.g.

2339 sexist). **Discrimination** is the behavior or actions, usually negative, towards an individual or group of  
2340 people, especially on the basis of sex/race/social class.

2341 9.32. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE2021/Annex B](#)  
2342 (pages 139 – 140) and more details about how to respond have been included in [KCSIE 2021 Part 5.](#)  
2343 [Child on child sexual violence and sexual harassment.](#)

#### 2344 **What staff should do if they have concerns about the child/young person**

2345 9.33. Staff working with children/young people are advised to maintain an attitude of ‘it could happen here’  
2346 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff  
2347 should always act in the best interests of the child/young person

2348 9.34. If staff have any concerns about a child’s/young person welfare, they should act on them immediately  
2349 by following this procedure and reporting their concern to the DSL/DSL Deputy.

#### 2350 **Opportunities to teach safeguarding**

2351 9.35. Governing bodies and proprietors should ensure that, as part of the requirement for staff to undergo  
2352 regular updated safeguarding training, including online safety and the requirement to ensure children  
2353 are taught about safeguarding, including online safety, that safeguarding training for staff, including  
2354 online safety training, is integrated, aligned and considered as part of the whole school safeguarding  
2355 approach and wider staff training and curriculum planning.

2356 9.36. Whilst considering the above training requirements, governing bodies and proprietors should have  
2357 regard to the [Teachers’ Standards](#) which set out the expectation that all teachers manage behaviour  
2358 effectively to ensure a good and safe educational environment and requires teachers to have a clear  
2359 understanding of the needs of all pupils.

2360 9.37. Governing bodies and proprietors should ensure that children are taught about safeguarding,  
2361 including online safety, and recognise that a one size fits all approach may not be appropriate for all  
2362 children, and a more personalised or contextualised approach for more vulnerable children, victims of  
2363 abuse and some SEND children might be needed.

2364 9.38. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may  
2365 cover relevant issues through tutorials). This may include covering relevant issues for schools through  
2366 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary  
2367 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be  
2368 found here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and  
2369 health education.](#)

2370 9.39. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:  
2371 Teaching about relationships sex and health. This includes teacher training modules on the RSHE topics  
2372 and non-statutory implementation guidance. The following resources may also help schools and  
2373 colleges understand and teach about safeguarding:

- 2374 • DfE advice for schools: [teaching online safety in schools](#);
- 2375 • UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#);
- 2376 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working  
2377 with children and young people](#);
- 2378 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the  
2379 maximum impact of any online safety sessions delivered by external visitors;
- 2380 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2381 • Public Health England: [Rise Above](#)

2382 9.40. As schools and colleges increasingly work online, it is essential that children are safeguarded from  
2383 potentially harmful and inappropriate online material. Whilst it is essential that governing bodies and

2384 proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful  
2385 that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with  
2386 regard to online teaching and safeguarding.

#### 2387 Online safety

2388 9.41. It is essential that children are safeguarded from potentially harmful and inappropriate online material.  
2389 An effective whole school and college approach to online safety empowers a school to protect and  
2390 educate pupils, students, and staff in their use of technology and establishes mechanisms to identify,  
2391 intervene in, and escalate any concerns where appropriate.

2392 9.42. The breadth of issues classified within online safety is considerable, but can be categorised into four  
2393 areas of risk which we’ll refer to as 4Cs later on:

2394 • **content:** being exposed to illegal, inappropriate or harmful content, for example:  
2395 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism,  
2396 radicalisation and extremism.

2397 • **contact:** being subjected to harmful online interaction with other users; for example: peer  
2398 to peer pressure, commercial advertising and adults posing as children or young adults  
2399 with the intention to groom or exploit them for sexual, criminal, financial or other  
2400 purposes’.

2401 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for  
2402 example, making, sending and receiving explicit images (e.g consensual and non-  
2403 consensual sharing of nudes and semi-nudes and/or pornography, sharing other  
2404 explicit images and online bullying; and

2405 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or  
2406 financial scams. If you feel your pupils, students or staff are at risk, please report it to the  
2407 Anti-Phishing Working Group <https://apwg.org/>

2408 9.43. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising  
2409 and implementing policies and procedures. This will include considering how online safety is reflected  
2410 as required in all relevant policies and considering online safety whilst planning the curriculum, any  
2411 teacher training, the role and responsibilities of the DSL and any parental engagement.

#### 2412 Online safety policy

2413 9.44. Online safety and the school or college’s approach to it should be reflected in the child protection policy.  
2414 Considering the 4Cs (above) will provide the basis of an effective online policy. The school should have  
2415 a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact  
2416 many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e.  
2417 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their  
2418 peers via their mobile and smart technology, share indecent images: consensually and non-  
2419 consensually (often via large chat groups), and view and share pornography and other harmful  
2420 content. Schools and colleges should carefully consider how this is managed on their premises and  
2421 reflect in their mobile and smart technology policy and their child protection policy.

2422 9.45. Information and support available to schools and colleges to keep children safe online can be found  
2423 in [KCSIE 2021 Annex D](#).

#### 2424 Remote Learning

2425 9.46. Where children are being asked to learn online at home the Department has provided advice to support  
2426 schools and colleges do so safely: [Schools Covid-19 operational guidance](#) (this covers Remote



2427 education) and [safeguarding and remote education](#). The NSPCC and PSHE Association also provide  
2428 helpful advice:

- 2429 • NSPCC Learning - [Undertaking remote teaching safely during school closures](#)
- 2430 • PSHE - [PSHE Association coronavirus hub](#)

#### 2431 **Filters and monitoring**

2432 9.47. Whilst considering their responsibility to safeguard and promote the welfare of children and provide  
2433 them with a safe environment in which to learn, governing bodies and proprietors should be doing all  
2434 that they reasonably can to limit children's exposure to the above risks from the school's or college's IT  
2435 system. As part of this process, governing bodies and proprietors should ensure their school has  
2436 appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider  
2437 the age range of their children, the number of children, how often they access the IT system and the  
2438 proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech IT team and  
2439 seek advice and support required.

2440 9.48. The appropriateness of any filters and monitoring systems are a matter for individual schools and  
2441 colleges and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK  
2442 Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might  
2443 look like: UK Safer Internet Centre: [appropriate filtering and monitoring](#).

#### 2444 **Information security and access management**

2445 9.49. Education settings are directly responsible for ensuring they have the appropriate level of security  
2446 protection procedures in place, in order to safeguard their systems, staff and learners and review the  
2447 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.  
2448 Guidance on e-security is available from the National Education Network. In addition, broader  
2449 guidance on cyber security including considerations for governors and trustees can be found at  
2450 NCSC.GOV.UK.

#### 2451 **Reviewing online safety**

2452 9.50. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should  
2453 consider carrying out an annual review of their approach to online safety, supported by an annual risk  
2454 assessment that considers and reflects the risks their children face. A free online safety self-review tool  
2455 for schools can be found via the [360 safe website](#).

2456 9.51. UKCIS has published [Online safety in schools and colleges: Questions from the governing board](#). The  
2457 questions can be used to gain a basic understanding of the current approach to keeping children safe  
2458 online; learn how to improve this approach where appropriate; and find out about tools which can be  
2459 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors  
2460 of trainee teachers and newly qualified teachers induct mentees and provide ongoing support,  
2461 development and monitoring.

#### 2462 **Information and support**

2463 9.52. There is a wealth of additional information available to support schools, colleges and parents to keep  
2464 children safe online. A sample is provided at [Annex D](#) (page 152 – 154).

#### 2465 **Cyberbullying**

2466 9.53. Central to Anti-bullying policy is the principle that 'bullying is always unacceptable' and that 'all  
2467 children/young people have a right not to be bullied'. School/colleges also recognises that it must take  
2468 note of bullying perpetrated outside school/college which spills over into the school/college; therefore

2469 once aware services will respond to any cyber-bullying we become aware of carried out by  
2470 children/young people when they are away from the site.

2471 9.54. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using  
2472 electronic forms of contact repeatedly over time against a victim who cannot easily defend  
2473 himself/herself.’

2474 • By cyber-bullying, we mean bullying by electronic media:

2475 • Bullying by texts or messages or calls on mobile ‘phones

2476 • The use of mobile ‘phone cameras to cause distress, fear or humiliation

2477 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,  
2478 personal websites, social networking sites

2479 • Using e-mail to message others

2480 • Hijacking/cloning e-mail accounts

2481 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2482 9.55. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate  
2483 defamatory information in any media including internet sites.

2484 9.56. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public  
2485 electronic communications network, a message or other matter that is grossly offensive or one of an  
2486 indecent, obscene or menacing character.

2487 9.57. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of  
2488 conduct amounting to harassment.

2489 9.58. If services become aware of any incidents of cyberbullying, they will need to consider each case  
2490 individually as to any criminal act that may have been committed. The services will pass on information  
2491 to the police if it feels that it is appropriate or is required to do so.

2492 **Gaming – raising awareness**

2493 9.59. Online gaming is an activity in which the majority of children and young people and many adults get  
2494 involved. The services will raise awareness by talking to children/young people/key workers/staff and  
2495 also where appropriate parents/carers involved about the games their children play and help them  
2496 identify whether they are appropriate.

2497 **Nudes/semi nudes images or videos**

2498 9.60. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or  
2499 others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones,  
2500 laptops - any device that enables the sharing of media and messages. Sexting may also be called:  
2501 trading nudes, dirties, pic for pic.

2502 9.61. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the  
2503 person doing it is a child. A young person is breaking the law if they:

2504 • take an explicit photo or video of themselves or a friend

2505 • share an explicit image or video of a child, even if it’s shared between children of the same age

2506 • possess, download or store an explicit image or video of a child, even if the child gave their  
2507 permission for it to be created.

2508 9.62. However, if a young person is found creating or sharing images, the police can choose to record that  
2509 a crime has been committed but that taking formal action isn’t in the public interest. There are many

2510 reasons why a young person may want to send a naked or semi-naked picture, video or message to  
2511 someone else:

- 2512 • joining in because they think that 'everyone is doing it'
- 2513 • boosting their self-esteem
- 2514 • flirting with others and testing their sexual identity
- 2515 • exploring their sexual feelings
- 2516 • to get attention and connect with new people on social media
- 2517 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the  
2518 person asking is persistent

2519 9.63. The risks of sexting are that the young person has no control over the images and how these are  
2520 shared, and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group  
2521 will provide education and guidance to prevent individuals from becoming victims of such situations  
2522 by encouraging them to think about the risk of sexting and understand how to seek help when  
2523 approached to take part in sexting. More information can be found on: [Keeping-children-safe/online-  
2524 safety/sexting-sending-nudes](#).

#### 2525 **Online reputation**

2526 9.64. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed  
2527 by posts, photos that have been uploaded and comments made by others on people's profiles. It is  
2528 important that children/young people and staff are aware that anything that is posted could influence  
2529 their future professional reputation. The majority of organisations and work establishments now check  
2530 digital footprint before considering applications for positions or places on courses.

#### 2531 **Grooming**

2532 9.65. On-line grooming is the process by which one person with an inappropriate sexual interest in  
2533 children/young people will approach a child/young person on-line, with the intention of developing a

2534 relationship with that child/young person, to be able to meet them in person and intentionally cause  
2535 harm.

2536 9.66. The services will build awareness amongst children/young people, parents/carers and staff about  
2537 ensuring that the child/young person:

2538 • Only has friends on-line that they know in real life

2539 • Is aware that if they communicate with somebody that they have met on-line, that relationship  
2540 should stay on-line.

2541 9.67. Where appropriate that the services will support parents/carers to:

2542 • Recognise the signs of grooming

2543 • Have regular conversations with their children/young people about on-line activity and how to stay  
2544 safe on-line

2545 9.68. Where appropriate the services will raise awareness by:

2546 • Regular communication with the families

2547 • Schools/colleges will include awareness around grooming as part of their curriculum

2548 • Identifying with the families and children/young people how they can be safeguarded against  
2549 grooming.

#### 2550 **Violence against women and girls (VAWG)**

2551 9.69. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of  
2552 women and girls. The government has a strategy looking at specific issues that women and girls face.

2553 9.70. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier  
2554 to equal participation of women and men in social, economic, and political spheres. Such violence  
2555 impedes gender equality and the achievement of a range of development outcomes. VAWG is a  
2556 complex and multifaceted problem that cannot effectively be addressed from a single vantage point.  
2557 The prevention of and response to such violence require coordinated action across multiple sectors.  
2558

#### 2559 **Female genital mutilation (FGM)**

2560 9.71. FGM comprises all procedures involving partial or total removal of the external female genitalia or other  
2561 injury to the female genital organs for non-medical reasons, hence interferes with the natural function  
2562 of girls' and women's bodies. It has no health benefits and harms girls and women in many ways.

2563 9.72. The age at which girls undergo FGM varies enormously according to the community in which they live.  
2564 The procedure may be carried out when the girl is new-born, during childhood or adolescence, just  
2565 before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to  
2566 take place between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher  
2567 risk.

2568 9.73. In 2003 FGM became a criminal offence for UK nationals or permanent UK residents to take their child  
2569 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty  
2570 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

#### 2571 **Forced marriage**

2572 9.74. In the case of children and young people: 'a forced marriage is a marriage in which one or both  
2573 spouses cannot consent to the marriage and duress is involved. Duress can include physical,

2574 psychological, financial, sexual and emotional pressure.' In developing countries approx. 11% of girls  
2575 are married before the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2576 9.75. It is important that all members of staff recognise the presenting symptoms, know how to respond if  
2577 there are concerns and where to turn for advice.

2578 9.76. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**  
2579 and locally through the local police safeguarding team or children's social care.

2580 9.77. While all members of staff (education, care, clinical) have important responsibilities with regard to  
2581 children, young people or adults who may be at risk of forced marriage, managers and leaders should  
2582 not undertake roles in this regard that are most appropriately discharged by other children's services  
2583 professionals such as police officers or social workers.

#### 2584 **Breast ironing**

2585 9.78. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's  
2586 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically  
2587 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and  
2588 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue  
2589 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where  
2590 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports  
2591 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used  
2592 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2593 9.79. Any suspected cases of breast ironing **MUST** be reported immediately under this Child Protection and  
2594 Safeguarding policy and the Individual offered medical help.

#### 2595 **Teenage relationship abuse**

2596 9.80. Research has shown that teenagers don't readily understand what constitutes abusive behaviour such  
2597 as controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone,  
2598 telling them what to wear, who they can/can't see or speak to and that this abuse is prevalent within  
2599 teen relationships.

2600 9.81. Further research shows that teenagers don't understand what consent means within their  
2601 relationships. They often hold the common misconception that rape can only be committed by a  
2602 stranger down a dark alley and don't understand that it could happen within their own relationships.  
2603 This can lead to these abusive behaviours feeling 'normal' and therefore unchallenged as they are not  
2604 recognised as being 'abusive'.

2605 9.82. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of  
2606 their own, their peers or others behaviour towards them. Therefore significant effort will be made to  
2607 raise awareness of it and respond effectively to such situations.

2608 9.83. In response to this Cambian Group will provide education and guidance to prevent teenagers from  
2609 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views  
2610 of violence, abuse and controlling behaviours, and understand what consent means within  
2611 relationships.

#### 2612 **Honour-based violence**

2613 9.84. It is often linked to family members or acquaintances who mistakenly believe someone has brought  
2614 shame to their family or community by doing something that is not in keeping with the traditional beliefs  
2615 of their culture. However, abuse committed in the context of preserving "honour" often involves a wider  
2616 network of family or community pressure and can include multiple perpetrators. It is important to be

2617 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to  
2618 take" for example, honour-based violence might be committed against individuals who:

- 2619 • become involved with a boyfriend or girlfriend from a different culture or religion
- 2620 • want to get out of an arranged marriage
- 2621 • want to get out of a forced marriage
- 2622 • wear clothes or take part in activities that might not be considered traditional within a particular  
2623 culture.

2624 9.85. Girls and women are the most common victims of honour-based violence however it can also affect  
2625 men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of  
2626 'honour' might include: domestic abuse, threats of violence, assault, sexual or psychological abuse,  
2627 forced marriage, being held against their will or taken somewhere they don't want to go.

2628 9.86. If staff believe that the Individual is at risk from honour-based violence the DSL will follow the usual  
2629 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual  
2630 is at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on  
2631 teachers. It is important that if honour-based violence is known or suspected, communities and family  
2632 members must NOT be contacted prior to referral to the police or social care as this could increase the  
2633 risk to the individual.

#### 2634 Preventing extremism and radicalisation

2635 9.87. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism  
2636 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**  
2637 **Extremism and Radicalisation policy** and **0.27 E-safety policy** we all need to be vigilant in ensuring the  
2638 safety from extremist and terrorist material when accessing the internet. We consider Great Dunmow  
2639 County Local Authority Safeguarding Children's Board arrangements to fulfil its Prevent duties.

2640 9.88. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from  
2641 other forms of harms and abuse, protecting children from this risk should be a part of a schools' or  
2642 colleges' safeguarding approach.

- 2643 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy,  
2644 the rule of law, individual liberty and the mutual respect and tolerance of different faiths and  
2645 beliefs. This also includes calling for the death of members of the armed forces.

- 2646 • **Radicalisation** refers to the process by which a person comes to support terrorism and  
2647 extremist ideologies associated with terrorist groups.

- 2648 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes  
2649 serious damage to property; or seriously interferes or disrupts an electronic system. The use  
2650 or threat **must** be designed to influence the government or to intimidate the public and is  
2651 made for the purpose of advancing a political, religious or ideological cause.

2652 9.89. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.  
2653 Background factors combined with specific influences such as family and friends may contribute to a  
2654 child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social  
2655 media or the internet) and settings (such as within the home).

2656 9.90. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent  
2657 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert  
2658 to changes in children's behaviour, which could indicate that they may be in need of help or protection.



2659 Staff should use their judgement in identifying children who might be at risk of radicalisation and act  
2660 proportionately which may include making a Prevent referral.

2661 9.91. The school's or college's DSL (and any deputies) should be aware of local procedures for making a  
2662 Prevent referral

2663 9.92. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security  
2664 Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent  
2665 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2666 9.93. [An online general awareness training module on Channel is available](#). The module is suitable for  
2667 school staff and other front-line workers. It introduces the topics covered by this advice, including how  
2668 to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the  
2669 types of intervention that may be appropriate, in addition to Channel.

#### 2670 **Prevent Duty**

2671 9.94. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs  
2672 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty](#)  
2673 [guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with  
2674 schools (and also covers childcare). DSLs and other senior leaders in colleges should familiar  
2675 themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The  
2676 guidance is set out in terms of four general themes: risk assessment, working in partnership, staff  
2677 training, and IT policies.

2678 9.95. Local authorities will be expected to ensure appropriate frontline staff, including those of it's  
2679 contractors, have a good understanding of Prevent are trained to recognise vulnerability to being  
2680 drawn into terrorism and are aware of available programmes to deal with this issue.

2681 9.96. As the independent body responsible for standards and quality improvement for further education, the  
2682 Education and Training Foundation will work with the sector to ensure that appropriate training is  
2683 available. This will include and draw from training provided through the network of Prevent co-  
2684 ordinators.

#### 2685 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

2686 9.97. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2687 9.98. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an  
2688 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal  
2689 activity, in exchange for something the victim needs or wants, and/or for the financial advantage or  
2690 increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE  
2691 and CCE can affect children, both male and female and can include children who have been moved  
2692 (commonly referred to as trafficking) for the purpose of exploitation.

#### 2693 **Child Criminal Exploitation (CCE)**

2694 9.99. Some specific forms of CCE can include children being forced or manipulated into transporting drugs  
2695 or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can  
2696 also be forced or manipulated into committing vehicle crime or threatening/committing serious  
2697 violence to others. Children can become trapped by this type of exploitation as perpetrators can  
2698 threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be  
2699 coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from  
2700 harm from others. As children involved in criminal exploitation often commit crimes themselves, their  
2701 vulnerability as victims is not always recognised by adults and professionals, (particularly older  
2702 children), and they are not treated as victims despite the harm they have experienced. They may still  
2703 have been criminally exploited even if the activity appears to be something they have agreed or  
2704 consented to.

2705 9.100. It is important to note that the experience of girls who are criminally exploited can be very different to  
2706 that of boys. The indicators may not be the same, however professionals should be aware that girls



2707 are at risk of criminal exploitation too. It is also important to note that both boys and girls being  
2708 criminally exploited may be at higher risk of sexual exploitation.

2709 **Child Sexual Exploitation (CSE)**

2710 9.101. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by  
2711 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing,  
2712 rubbing, and touching outside clothing. It may include noncontact activities, such as involving children  
2713 in the production of sexual images, forcing children to look at sexual images or watch sexual activities,  
2714 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for  
2715 abuse including via the internet.

2716 9.102. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate  
2717 knowledge e.g. through others sharing videos or images of them on social media.

2718 9.103. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and  
2719 17 year olds who can legally consent to have sex. Some children may not realise they are being  
2720 exploited e.g. they believe they are in a genuine romantic relationship

2721 9.104. Children with learning difficulties can be particularly vulnerable to exploitation as can children from  
2722 particular groups, e.g. looked after children, young carers, children who have a history of physical,  
2723 sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol,  
2724 children who go missing from home or school, children involved in crime, children with parents/carers  
2725 who have mental health problems, learning difficulties/other issues, children who associate with other  
2726 children involved in exploitation. However, it is important to recognise that any child can be targeted.

2727 9.105. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors  
2728 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or  
2729 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants  
2730 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator  
2731 or facilitator.

2732 9.106. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age  
2733 of 18 years, including 16 and 17 year olds who can legally consent to have sex) or adults. It is critical to  
2734 know that children/young people may also be exploited by other children/young people, who  
2735 themselves may be experiencing exploitation – where this is the case, it is important that the  
2736 child/young person perpetrator is also recognised as a victim.

2737 9.107. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic  
2738 to complex organised abuse. It can involve force and/or enticement-based methods of compliance  
2739 and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even  
2740 when activity appears consensual and it should be noted exploitation as well as being physical can be  
2741 facilitated and/or take place online. More information include definitions and indicators are included

- 2742 in - [KCSIE2021 - Part One](#). Some of the following can be indicators of both child criminal and sexual  
2743 exploitation where children:
- 2744 • appear with unexplained gifts or new professions;
  - 2745 • associate with other young people involved in exploitation;
  - 2746 • suffer from changes in emotional well-being;
  - 2747 • misuse drugs and alcohol;
  - 2748 • go missing for periods of time or regularly or come home late; and
  - 2749 • regularly miss school or education or do not take part in education.
- 2750
- 2751 9.108. Some additional specific indicators that may be present in CSE and children who:
- 2752 • Children who have older boyfriends or girlfriends; and
  - 2753 • Children who suffer from sexually transmitted infections, display sexual behaviours beyond  
2754 expected sexual development or or become pregnant.
- 2755 9.109. Further information on signs of a child's involvement in sexual exploitation is available in Home Office  
2756 guidance: Child sexual exploitation: guide for practitioners.
- 2757 9.110. As an organisation we do recognise that the same level of exploitation may take place involving  
2758 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged  
2759 18 years or over and at risk of abuse or neglect because of their needs for care and/or support (The  
2760 Care Act 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is  
2761 expected that the above statement will equally apply to those who are 18+ across England and Wales.
- 2762 9.111. Children under the age of criminal responsibility (under the age of 10), or young people who have  
2763 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into  
2764 criminal activity provide opportunity for criminals to distance themselves from crime.
- 2765 **County Lines**
- 2766 9.112. County lines is a term used to describe gangs and organised criminal networks involved in exporting  
2767 illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen  
2768 locally as well as across the UK - no specified distance of travel is required. Children and vulnerable  
2769 adults are exploited to move, store and sell drugs and money. Offenders will often use coercion,  
2770 intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.  
2771 Children can be targeted and recruited. Exploitation is an integral part of the county lines, children may  
2772 become victims through: coercion, intimidation, violence (including sexual) and weapons.
- 2773 9.113. Children can be targeted and recruited into county lines in a number of locations including schools,  
2774 further and higher educational institutions, pupil referral units, special educational needs schools,  
2775 children's homes and care homes. Children are often recruited to move drugs and money between  
2776 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed  
2777 internally to avoid detection. Children can easily become trapped by this type of exploitation as county  
2778 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their  
2779 families) if they attempt to leave the county lines network.
- 2780 9.114. Children are also increasingly being targeted and recruited online using social media. Children can  
2781 easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts  
2782 which need to be worked off or threaten serious violence and kidnap towards victims (and their  
2783 families) if they attempt to leave the county lines network. These children and young people are at  
2784 serious risk of criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group

2785 who may not necessarily be affiliated to a gang, but who have developed networks across  
2786 geographical boundaries to access and exploit existing drugs markets in these areas.

2787 9.115. The group, or individuals exploited by them, travel regularly between the urban hub and the rural  
2788 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug  
2789 supply but is generally more frequent and in smaller deal amounts compared to most other drug  
2790 supply methods.

2791 9.116. A number of the indicators for CSE and CCE as detailed above may be applicable to where children  
2792 are involved in county lines. Some additional specific indicators that may be present where a child is  
2793 criminally exploited through involvement in county lines are children who:

2794 • go missing and are subsequently found in areas away from their home;

2795 • have been the victim or perpetrator of serious violence (e.g. knife crime);

2796 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and  
2797 collecting money for drugs;

2798 • are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid  
2799 detection;

2800 • are found in accommodation that they have no connection with, often called a 'trap house or  
2801 cuckooing' or hotel room where there is drug activity;

2802 • owe a 'debt bond' to their exploiters;

2803 • have their bank accounts used to facilitate drug dealing.

2804 9.117. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be  
2805 considered alongside consideration of availability of local services/third sector providers who offer  
2806 support to victims of county lines exploitation.

## 2807 Cuckooing

2808 9.118. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation  
2809 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to  
2810 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to  
2811 as cuckooing.

2812 9.119. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order  
2813 to use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common

- 2814 problem in the South of England. The crime is named for the cuckoo's practice of taking over other  
2815 birds' nests for its young.
- 2816 9.120. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and  
2817 firearms.
- 2818 9.121. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally  
2819 exploited include:
- 2820 ▪ Increase in missing episodes (Education and/or Care) – particular key as children/young people  
2821 can be missing for days and drug run in other counties
  - 2822 ▪ Having unexplained amounts of money, new high cost items and multiple mobile phones
  - 2823 ▪ Increased social media and phone/text use, almost always secretly
  - 2824 ▪ Older males in particular seen to be hanging around and driving
  - 2825 ▪ Having injuries that are unexplained and unwilling to be looked at
  - 2826 ▪ Increase in aggression, violence and fighting
  - 2827 ▪ Carrying weapons – knives, baseball bats, hammers, acid
  - 2828 ▪ Travel receipts that are unexplained
  - 2829 ▪ Significant missing cases from education and disengaging from previous positive peer groups
  - 2830 ▪ Parents/carers concerns and significant changes in behaviour that affect emotional wellbeing
- 2831 9.122. We will treat any child/young person who may be criminally exploited as a victim in the first instance  
2832 and refer to the Local Safeguarding Authority in the first instance. If a referral to the police is also  
2833 required as crimes have been committed on the school premises, these will also be made.
- 2834 **Knife crime**
- 2835 9.123. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes  
2836 references to both; to the use of knives against children either to threaten or to wound them and to  
2837 instances when children may have been carrying or using knives for a range of purposes.
- 2838 9.124. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults  
2839 and knife-carrying. However, there are many different criminal offences relating to knives. For example:
- 2840 • it is an offence to threaten or cause harm to a person with a bladed weapon
  - 2841 • some bladed weapons are prohibited from being sold or purchased, including to anyone  
2842 under the age of 18
  - 2843 • offences such as robbery or assault can be aggravated if a knife is involved
  - 2844 • it is also an offence to carry a knife in a public place without good reason.
  - 2845 • It is clear that knife crime is an increasing safeguarding risk to children and young people,  
2846 both at school and in their local communities. While Ofsted have not sought to answer  
2847 the question of the causes of knife crime, leaders told Ofsted that, in their experience,  
2848 children are in three categories of risk of knife-carrying.
- 2849 9.125. The highest level of risk is for those children who have been groomed into gangs, for the purposes of  
2850 criminal exploitation.
- 2851 9.126. Underneath this lies a group of children who have witnessed other children carrying knives, have been  
2852 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition

2853 or who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and  
2854 knives on social media.

2855 9.127. Then there are children who carry knives to school as an isolated incident. For example, they may carry  
2856 a penknife that a grandparent has gifted them

2857 9.128. It is important to remember that knife crime does not exist in a vacuum and children who are victims  
2858 or perpetrators may also be experiencing multiple vulnerabilities.

2859 9.129. Some children and young people can be more at risk of being drawn into criminality, multiple studies  
2860 demonstrate a clear link between inequality and high rates of violence for example. There is a need to  
2861 both understand and address individual risk factors as well as address the social challenges that  
2862 underpin criminal exploitation and serious violence in our communities, from poor mental health,  
2863 addiction, poverty, unemployment and poor-quality housing.

#### 2864 **Missing young people and the link between missing and county lines**

2865 9.130. Every precaution is taken through the use of risk assessments and thorough planning and supervision  
2866 to ensure that children, young people and young adults are safe both at school, college, home, and  
2867 on outings. If a child, young person or young adult goes missing from our Location it is considered a  
2868 potential indicator of abuse or neglect.

2869 9.131. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of  
2870 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to  
2871 attend school regularly or has been absent without the school's permission for a continuous period of  
2872 10 days or more or as such intervals agreed with the Local Authority. It is essential that all staff are  
2873 alert to signs such as travelling to conflict zones, FGM and forced marriage.

2874 9.132. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them  
2875 towards going missing and becoming involved in criminal activities. Some individuals may be pulled  
2876 towards exploitation through the promise of money, gifts, affection and status. However, they may be  
2877 then be forced to work for these people as they are coerced into believing that they are indebted to  
2878 them.

#### 2879 **Domestic abuse**

2880 9.133. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever  
2881 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as  
2882 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of  
2883 domestic abuse, based on the previous cross-government definition, ensures that different types of  
2884 relationships are captured, including ex-partners and family members. The definition captures a range  
2885 of different abusive behaviours, including physical, emotional and economic abuse and coercive and  
2886 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the  
2887 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as  
2888 defined in section 2 of the 2021 Act).

2889 9.134. Types of domestic abuse include intimate partner violence, abuse by family members, teenage  
2890 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of  
2891 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background  
2892 and domestic abuse can take place inside or outside of the home. The government will issue statutory  
2893 guidance to provide further information for those working with domestic abuse victims and  
2894 perpetrators, including the impact on children.

2895 9.135. All children can witness and be adversely affected by domestic abuse in the context of their home life  
2896 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence  
2897 can have a serious, long lasting emotional and psychological impact on children. In some cases, a  
2898 child may blame themselves for the abuse or may have had to leave the family home as a result.

2899 9.136. Young people can also experience domestic abuse within their own intimate relationships. This form  
2900 of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age  
2901 of the young people, this may not be recognised in law under the statutory definition of 'domestic

2902 abuse' (if one or both parties are under 16). However, as with any child under 18, where there are  
2903 concerns about safety or welfare, child safeguarding procedures should be followed and both young  
2904 victims and young perpetrators should be offered support. The Act's provisions, including the new  
2905 definition, will be commenced over the coming months.

2906 9.137. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work  
2907 together to provide emotional and practical help to children. The system ensures that when police are  
2908 called to an incident of domestic abuse, where there are children in the household who have  
2909 experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before  
2910 the child or children arrive at school the following day. This ensures that the school has up to date  
2911 relevant information about the child's circumstances and can enable immediate support to be put in  
2912 place, according to the child's needs. Operation Encompass does not replace statutory safeguarding  
2913 procedures. Where appropriate, the police and/or schools should make a referral to children's social  
2914 care if they are concerned about a child's welfare. More information about the scheme and how  
2915 schools can become involved is available on the Operation Encompass website.

2916 9.138. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in  
2917 confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential  
2918 victims, as well as those who are worried about friends and loved ones. It also has a form through  
2919 which a safe time from the team for a call can be booked. Additional advice on identifying children  
2920 who are affected by domestic abuse and how they can be helped is available at:

- 2921 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 2922 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 2923 • [Safelives: young people and domestic abuse.](#)
- 2924 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes  
2925 information for adult victims, young people facing abuse in their own relationships and  
2926 parents experiencing child to parent violence/abuse)
- 2927 • Home : [Operation Encompass](#) (includes information for schools on the impact of  
2928 domestic abuse on children)

## 2929 Serious Violent Crime

2930 9.139. All staff should be aware of indicators, which may signal that children are at risk from, or are involved  
2931 with serious violent crime. These may include:

- 2932 • increased absence from school with a significant decline in performance,
- 2933 • a change in friendships or relationships with older individuals or group,
- 2934 • signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries,
- 2935 • unexplained gifts or new possessions could also indicate that children have been approached by,  
2936 or are involved with individuals associated with criminal networks or gangs.

2937 9.140. All staff should be aware of the associated risks and understand the measures in place to measure  
2938 these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and



2939 gang involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance](#)  
2940 [- September 2018](#).

2941 **Mental Health**

2942 9.141. Schools, colleges and homes have an important role to play in supporting the mental health and  
2943 wellbeing of young people. All staff should be aware that mental health problems can, in some cases,  
2944 be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

2945 9.142. Schools/colleges and homes need to ensure they have clear systems and processes in place for  
2946 identifying possible mental health problems, including routes to escalate and clear referral and  
2947 accountability systems.

2948 9.143. The Department is providing funding to support costs of a significant training program for senior mental  
2949 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will  
2950 be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole  
2951 school approach to mental health.

2952 9.144. Only appropriately trained professionals should attempt to make a diagnosis of a mental health  
2953 problem. Staff however, are well placed to observe children day-to-day and identify those whose  
2954 behaviour suggests that they may be experiencing a mental health problem or be at risk of developing  
2955 one. If staff suspect this might be the case they should report their concerns to a senior leader within  
2956 the school and if possible bring their concerns to a member of the clinical team.

2957 9.145. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood  
2958 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It  
2959 is key that staff receive appropriate education and training so that they are aware of how these  
2960 children's experiences, can impact on their mental health, behaviour and education.

2961 9.146. If staff have a mental health concern about a child that is also a safeguarding concern, immediate  
2962 action should be taken. Staff should follow their child protection policy and speak immediately to the  
2963 DSL or a deputy.

2964 9.147. Schools and colleges can access a range of advice to help them identify children in need of extra  
2965 mental health support, this includes working with external agencies. More information can be found  
2966 in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance  
2967 as best practice. Public Health England has produced a range of resources to support secondary school  
2968 teachers to promote positive health, wellbeing and resilience among children.

2969 9.148. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be  
2970 useful for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out  
2971 how schools and colleges can help prevent mental health problems by promoting resilience as part of  
2972 an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to  
2973 the needs of their pupils.

2974 9.149. In addition, Public Health England has produced a range of resources to support secondary schools to  
2975 promote positive health, wellbeing and resilience among children including its guidance Promoting  
2976 children and young people's emotional health and wellbeing. Its resources include social media,  
2977 forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson  
2978 plans. The Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which  
2979 provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits



2980 alongside our [Wellbeing for education recovery program](#) content, which covers issues such as  
2981 bereavement, loss, anxiety, stress and trauma.

2982 **Human trafficking**

2983 9.150. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a  
2984 process that is a combination of:

- 2985 - Movement (including within the UK);  
2986 - Control, through harm / threat of harm or fraud  
2987 - For the purpose of exploitation

2988 9.151. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming  
2989 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a  
2990 life of abuse, servitude and inhumane treatment.

2991 9.152. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is  
2992 significant evidence that children/young people/young adults (both of UK and other citizenship) are

- 2993 being trafficked internally within the UK and this is regarded as a more common form of trafficking in  
2994 the UK.
- 2995 9.153. There are a number of indicators which suggest that a child/young person/young adult may have  
2996 been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are  
2997 as follows:
- 2998 - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or  
2999 has an unwanted pregnancy
- 3000 - Has a history with missing links and unexplained moves
- 3001 - Is required to earn a minimum amount of money every day
- 3002 - Works in various locations
- 3003 - Has limited freedom of movement
- 3004 - Appears to be missing for periods
- 3005 - Is known to beg for money
- 3006 - Is being cared for by adult/s who are not their parents and the quality of the relationship between  
3007 the child and their adult carers is not good
- 3008 - Is one among a number of unrelated children found at one address
- 3009 - Has not been registered with or attended a GP practice
- 3010 - Is excessively afraid of being deported.
- 3011 9.154. For those children/young people/young adults who are internally trafficked within the UK indicators  
3012 include:
- 3013 - Physical symptoms (bruising indicating either physical or sexual assault)
- 3014 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 3015 - Reports from reliable sources suggesting the likelihood of involvement in
- 3016 - Sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- 3017 - Evidence of drug, alcohol or substance misuse
- 3018 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing  
3019 clothing from older people
- 3020 - Relationship with a significantly older partner
- 3021 - Accounts of social activities, expensive clothes, mobile phones or other possessions with no  
3022 plausible explanation of the source of necessary funding
- 3023 - Persistently missing, staying out overnight or returning late with no plausible explanation
- 3024 - Returning after having been missing, looking well cared for despite having not been at home
- 3025 - Having keys to premises other than those known about
- 3026 - Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating  
3027 disorder, promiscuity
- 3028 - Truancy / disengagement with education

- 3029 - Entering or leaving vehicles driven by unknown adults
- 3030 - Going missing and being found in areas where the child/young person/young adult has no known  
3031 links; and/or
- 3032 - Possible inappropriate use of the internet and forming on-line relationships, particularly with  
3033 adults/other adults.
- 3034 9.155. These behaviours themselves do not indicate that an Individual is being trafficked, but should be  
3035 considered as indicators that this may be the case.
- 3036 **Modern slavery and the National Referral Mechanism**
- 3037 9.156. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory  
3038 labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery,  
3039 servitude, forced criminality and the removal of organs.
- 3040 9.157. When considering modern slavery, there is a perception that this is taking place overseas. The  
3041 government estimates that tens of thousands of slaves are in the UK today.
- 3042 9.158. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,  
3043 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from  
3044 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also  
3045 been rescued within the UK.
- 3046 9.159. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be  
3047 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.
- 3048 9.160. Further information on the signs that someone may be a victim of modern slavery, the support available  
3049 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.  
3050 Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))
- 3051 **Cybercrime**
- 3052 9.161. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised  
3053 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-  
3054 line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent  
3055 crimes include:
- 3056 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's  
3057 computer network to look for test paper answers or change grades awarded;
  - 3058 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,  
3059 network or website unavailable by overwhelming it with internet traffic from multiple sources;  
3060 and
  - 3061 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,  
3062 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,  
3063 including those above.
- 3064 9.162. Children with particular skill and interest in computing and technology may inadvertently or  
3065 deliberately stray into cyber-dependent crime.
- 3066 9.163. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into  
3067 the Cyber Choices programme. This is a nationwide police programme supported by the Home Office  
3068 and led by the National Crime Agency, working with regional and local policing. It aims to intervene  
3069 where young people are at risk of committing, or being drawn into, low level cyber-dependent  
3070 offences and divert them to a more positive use of their skills and interests.
- 3071 9.164. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of  
3072 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-

3073 line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When](#)  
3074 [to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

3075 **Initiation/Hazing**

3076 9.165. Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such  
3077 as a private school, sports team etc. There are a number of different forms, from relatively mild rituals  
3078 to severe and sometimes violent ceremonies in gangs/criminal groups.

3079 9.166. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials  
3080 which promote a bond between them. After the hazing is over, the newcomers also have something  
3081 in common with older members of the organisation, because they all experienced it as part of a rite of  
3082 passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

3083 9.167. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour  
3084 and raise awareness of such within all services.  
3085

3086 **Safeguarding issues relating to Individual children and young people needs**

3087 **Homelessness**

3088 9.168. As an organisation we recognise that being homeless or being at risk of becoming homeless presents  
3089 a real risk to a child's/young person welfare. The impact of losing a place of safety and security can  
3090 affect an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress  
3091 concerns at the earliest opportunity.

3092 9.169. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing  
3093 Authority for the parent/guardians in order to raise/progress concerns.

3094 9.170. In most cases school and college colleagues will be considering homelessness in the context of  
3095 children who live with their families, and intervention will be on that basis. However, it should also be  
3096 recognised in some cases 16 and 17 year olds could be living independently from their parents or  
3097 guardians, for example through their exclusion from the family home, or other reasons. This will require  
3098 a different level of intervention and support. Children's services will be the lead agency for these young  
3099 people and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's  
3100 circumstances. The department and the Ministry of Housing, Communities and Local Government have

3101 published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may  
3102 be homeless and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3103 9.171. Guidance on how local authorities should exercise their homelessness functions in accordance with  
3104 the Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local](#)  
3105 [authorities](#).

3106 9.172. Children’s services (Adult’s services where the person is 18 +) will be the lead agency for these young  
3107 people and the DSL should ensure appropriate referrals are made based on the Individual’s  
3108 circumstances.

3109 9.173. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be  
3110 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding  
3111 Authority where an Individual has been harmed or is at risk of harm.

3112 **Private Fostering**

3113 9.174. Private fostering is an arrangement by a child’s parents for their child (under 16 or 18 if disabled) to be  
3114 cared for by another adult who is not closely related and is not a legal guardian with parental  
3115 responsibility for 28 days or more.

3116 9.175. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,  
3117 uncle or aunt.

3118 9.176. The Law requires that the carers and parents must notify the Children’s Services Department of any  
3119 private fostering arrangement.

3120 9.177. If the school/college/children’s home/care homes (16-18) becomes aware that a child/young person  
3121 is being privately fostered they will inform the Children’s Services Department and inform both the  
3122 parents and carers that they have done so.

3123 **Child and the Court System**

3124 9.178. As an organisation we recognise that children/young people are sometimes required to give evidence  
3125 in criminal courts, either for crimes committed against them or for crimes they have witnessed. We  
3126 know that this can be a stressful experience and therefore services across the organisation will aim to  
3127 support children through this process.

3128 9.179. Along with information, advice and guidance, services will use age-appropriate materials published  
3129 by HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it  
3130 means to be a witness, how to give evidence and the special measures which are in place to assist  
3131 such as using a live link/aids to communicate and video links.

3132 9.180. We recognise that making child arrangements via the family courts following separation can be  
3133 stressful and entrench conflict in families. This can be very stressful for children. Services will support  
3134 children/young people going through this process.

3135 9.181. Alongside information, advice and guidance services will use online materials published by The  
3136 Ministry of Justice (2018) which offers children/young people information & advice on the dispute

3137 resolution service - [Get help with child arrangements](#). These materials will also be offered to parents  
3138 and carers if appropriate.

3139 9.182. Ensure that children/young people are sufficiently supported where a parent has been sent to prison,  
3140 adequate support includes protection from: stigma, isolation and poor mental health.

3141 **Fabricated or induced illnesses (FI)**

3142 9.183. Fabricated or induced illness (FI) is a rare form of child abuse. It occurs when a parent or carer, usually  
3143 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3144 9.184. FI is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's  
3145 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3146 9.185. FI covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child.  
3147 This ranges from extreme neglect (failing to seek medical care) to induced illness.

3148 9.186. Behaviours in FI include a parent/carer who:

- 3149 - persuades healthcare professionals that their child is ill when they're perfectly healthy,
  - 3150 - exaggerates or lies about their child's symptoms,
  - 3151 - manipulates test results to suggest the presence of illness – for example, by putting glucose in urine  
3152 samples to suggest the child has diabetes,
  - 3153 - deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary  
3154 medication or other substances.
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