

SAFEGUARDING AND CHILD PROTECTION POLICY

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1. INTRODUCTION

- 1.1. This policy is applicable to the Stephen Perse Foundation (the **Foundation**). It is applicable to the whole school community including those children in the Early Years Foundation Stage (EYFS) and in boarding.
- 1.2. As such, although this policy is the Foundation's overarching Safeguarding and Child Protection Policy, it also sets out in detail any specific requirements and procedures that must be followed for any of the individual Foundation schools.

2. SCOPE

- 2.1. Throughout the policy and supporting documentation, reference is made to a 'child' and 'children'. These terms are used to mean those under the age of 18. The Foundation recognises that some adults are also vulnerable to abuse therefore the procedures may be applied, with appropriate adaptations, to allegations of abuse and the protection of students over the age of 18 who are at risk.

3. GUIDING PRINCIPLES

- 3.1. The safety and welfare of all our pupils at the Foundation is our highest priority. We strive to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. We operate with the best interests of the child at heart.
- 3.2. The Foundation ensures that safeguarding and child protection is at the forefront and underpin all relevant aspects of process and policy development.
- 3.3. In all matters relating to child protection the Foundation will follow the procedures laid down by the relevant Safeguarding Partnership Board (which is The Cambridgeshire and Peterborough Safeguarding Children Partnership Board (CPSCP) for all schools in the Foundation apart from Dame Bradbury's where the Essex Safeguarding Children Board applies) or, where appropriate, the relevant Safeguarding Partnership Board for a child together with Department of Education guidance contained in Working Together to Safeguard Children (July 2018) and Keeping Children Safe in Education 2021 (KCSIE 2021). In Essex, all professionals must work in accordance with the Southend, Essex and Thurrock (**SET**) Procedures (Essex Safeguarding Children Board (**ESCB**)).
- 3.4. The Foundation has separate Coronavirus (COVID-19) policies, procedures and risk assessments, which are being reviewed on an ongoing basis, to ensure compliance with current guidance and best practice where appropriate. Staff should refer to the Foundation Coronavirus Policy and Procedures and the remote teaching arrangements alongside this policy.
- 3.5. This policy has regard to the following legislation and guidance:
 - [Keeping Children Safe in Education 2021 \(KCSIE 2021\)](#)
 - [Working Together to Safeguard Children \(July 2018, updated December 2020\)](#)

- [Guidance for safer working practice for those working with children and young people in education settings \(2019\)](#)
- [Education Act 2002](#)
- [Disqualification under the Childcare Act 2006 \(statutory guidance, August 2018\)](#)
- [The National Minimum Standards for Boarding Schools \(April 2015\) \(NMS\)](#)
- [Statutory framework for the Early Years Foundation Stage](#)
- [Revised Prevent Duty Guidance for England and Wales \(July 2015, updated April 2021\);](#)
- [Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism \(April 2015, updated 2020\);](#)
- [The Prevent Duty: Departmental advice for schools and childminders \(June 2015, updated August 2015\)](#)
- [The use of social media for online radicalisation \(July 2015\)](#)
- [Let's Talk About It: Working Together to Prevent Terrorism](#)
- [Multi-agency statutory guidance on FGM \(April 2016, updated July 2020\);](#)
- [What to do if you're worried a child is being abused: advice for practitioners \(March 2015\)](#)
- [Information sharing: advice for practitioners providing safeguarding services \(July 2018\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(DCMS and UKCIS, December 2020\)](#)
- [SET Procedures \(ESCB October 2019\)](#)
- [Effective Support for Children and Families in Peterborough and Cambridgeshire \(2018\)](#)
- [Effective Support for Children and Families in Essex \(ESCB 2017\)](#)
- [PREVENT Policy and Guidance - Southend Safeguarding Children Board, Essex Safeguarding Children Board and Thurrock Safeguarding Children Board, April 2019](#)
- [Preventing youth violence and gang involvement - Practical advice for schools and colleges](#)
- [Criminal exploitation of children and vulnerable adults: county lines \(updated February 2020\)](#)
- [Counter Terrorism and Security Act 2015](#)
- [Serious Crime Act 2015](#)
- [Sexual Offences Act 2003](#)
- [Education \(Pupil Registration\) Regulations 2016](#)
- [Data Protection Act 2018](#)
- [Searching, screening and confiscation guidance for practitioners \(2014, updated 2018\)](#)
- Children Act 1989
- Children Act 2004
- [Preventing and Tackling Bullying guidance \(2017\)](#)
- [Female Genital Mutilation Act 2003 \(s. 74 Serious Crime Act 2015\)](#)
- [Promoting education of looked after children and previously looked after children \(February 2018\)](#)
- [The designated teacher for looked-after and previously looked-after children - Statutory guidance on their roles and responsibilities \(February 2018\)](#)
- [Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation \(DfE, February 2017\)](#)

3.6. There are four main elements to our policy:

3.6.1. **Prevention** through the teaching and pastoral support offered to pupils and the creation and maintenance of a protective ethos across the Foundation.

- 3.6.2. **Procedures** for identifying and reporting cases, or suspected cases, of abuse. The definitions of the four categories of abuse are in Appendix 1.
- 3.6.3. **Supporting children**, particularly those who may have been abused or witnessed violence towards others.
- 3.6.4. **Preventing unsuitable people working with children**, processes are followed to ensure that those who are unsuitable to work with children are not employed.

4. **PREVENTION**

- 4.1. We recognise that the Foundation plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supportive friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role the Foundation plays in recognising and protecting our pupils who may be vulnerable to radicalisation or exposed to extremist views.
- 4.2. The Foundation is committed to safeguarding and promoting the welfare of each pupil in its care and will:
- establish and maintain an environment where pupils feel safe, including in a digital context;
 - provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks and know when and how to ask for help for themselves and others to stay safe. This includes through our PSHEE and Relationships Education/Relationships and Sex Education which will cover relevant topics in an age and stage appropriate way;
 - practise safe recruitment by checking the suitability of staff, Governors and volunteers to work with children and young people. See the Foundation's separate Safer Recruitment Policy;
 - maintain a Single Central Register of Appointments for all staff and a separate record of all volunteers;
 - ensure that all teaching staff and support staff (collectively known as "staff") receive child protection training, carried out by the Designated Safeguarding Lead or other appropriately qualified staff, on induction;
 - ensure that where staff from another organisation are working with its pupils on the Foundation sites, the Foundation has received appropriate assurances that approved child protection checks and procedures apply to those staff;
 - follow the inter-agency procedures of the Cambridgeshire and Peterborough Safeguarding Children Partnership Board and the Essex Safeguarding Children Board;
 - make arrangements (one-to-one tutorials, PSHEE, tutor time, school counsellors) to listen carefully to pupils, provide early help to children and take their concerns seriously;
 - be alert to signs of abuse or possible abuse, both in the Foundation and outside, and strive to protect each pupil from any form of abuse;
 - implement appropriate measures to ensure that international applications relate to genuine students, in accordance with the UKVI guidance, to help to prevent potential child exploitation practices;

- be alert to the potential vulnerability of international pupils, many of whom will be in the UK without their parents, and ensure that an Education Guardian is appointed in accordance with the Foundation’s Education Guardianship Policy;
- deal appropriately with every suspicion or complaint of abuse;
- design and operate procedures which promote this policy and which, so far as possible, minimise the impact upon the innocent of unfounded allegations;
- support children who have been abused in accordance with his/her agreed child protection plan;
- be alert to the healthcare needs of pupils with medical conditions;
- operate appropriate health & safety procedures;
- ensure that the Foundation premises are as secure as circumstances reasonably permit;
- operate clear and supportive policies to discourage drugs, alcohol and substance misuse;
- consider and develop procedures to deal with any other safety and welfare issues in the Foundation or in the local area which may be specific to individual pupils including e-safety, mental and emotional wellbeing and safer cycling;
- ensure that any weaknesses or deficiencies in the Foundation’s child protection arrangements are remedied without delay;
- give specific attention to safeguarding arrangements where pupils are engaged in close one-to-one teaching (performing arts, sports, music). Such arrangements are detailed in the Code of Conduct for staff and volunteers;
- ensure appropriate safeguards are in place to provide distinct areas in boarding for children and those aged who are aged 18 and above respectively;
- implement appropriate measures for visitors to staff accommodation; and
- implement measures as appropriate to each situation for any shared activities, such as sport or other enrichment, which involve both younger pupils and students who are aged 18 and above.

5. **PROCEDURES**

- 5.1. Every member of staff and Governor of the Foundation, as well as every volunteer who assists the Foundation, has a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy; safeguarding and promoting the welfare of pupils is everyone's responsibility. This includes a duty both to children in need and to children at risk of harm. Our procedures also apply to extended school and off-site activities.
- 5.2. All staff, volunteers and Governors must read and understand at least Part 1 and/or Annex A as well as Annex B of KCSIE 2021 and “What to do if you’re worried a child is being abused: Advice for practitioners” (March 2015). All Foundation leaders and Foundation staff who work directly with pupils should read and understand the entirety of KCSIE 2021.
- 5.3. All Foundation staff, volunteers and Governors should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns. A flowchart setting out the actions to be taken where there are concerns about a child can be found at Appendix 8. The Governors ensure that the following mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 (or Annex A where appropriate) of KCSIE 2021.

- 5.4. This Policy has been authorised by the Governors and is available to parents on request, and is published on the Foundation website. It applies wherever staff or volunteers are working with pupils, even where this is away from the Foundation sites and applies to all pupils, with appropriate adaptations for those who are aged 18 or above.
- 5.5. Safeguarding and promoting the welfare of children is defined as:
- a. Protecting children from maltreatment;
 - b. Preventing impairment of children’s mental and physical health or development;
 - c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - d. Taking action to enable all children to have the best outcomes.
- 5.6. Every pupil should feel safe and protected from any form of abuse and neglect. Please see Appendix 1 for explanations of the types of abuse and possible signs of abuse. Some pupils may be in need of additional support even though they may not be deemed at risk of harm – such pupils are classed as ‘children in need’. The Foundation takes pupils’ mental and emotional wellbeing seriously. All concerns outside Child Protection are dealt with through the pastoral system and should be raised with the pupil’s tutor/form teacher in the first instance. It may be necessary for the relevant school to complete a common assessment framework (CAF) form for a child in need in order to access local services.

6. RAISING AWARENESS

- 6.1. The Governing Body has designated one of its members to take leadership responsibility in the Foundation’s safeguarding arrangements. Professor Rob Foale is the nominated liaison Governor for safeguarding issues. There is a written role specification for the designated Governor.
- 6.2. The role of the nominated Governor is to liaise with the local authority on issues of child protection or in case of allegations against the Principal or a member of the Governing Body. The nominated Governor, in conjunction with the Designated Safeguarding Lead (DSL), carry out an annual review of the Foundation's Safeguarding and Child Protection Policy and procedures with day-to-day issues being delegated to its safeguarding group, which both the DSL and other appropriately trained deputies (Deputy Designated Safeguarding Leads (DDSL) are part of.
- 6.3. The Governing Body is responsible for:
- strategic leadership of the Foundation’s safeguarding arrangements and ensuring that the Foundation complies with its duties under legislation;
 - reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
 - ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay;
 - approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice;

- nominating a governor, who has undertaken appropriate training, for safeguarding and child protection matters;
- ensuring an appropriate member of staff from the Foundation Leadership Team is appointed to the role of DSL;
- ensuring that the DSL has appropriate status and authority within the Foundation to carry out the post and that they have the time, funding, training, resources and support to provide advice and support to other staff on child welfare and protection matters;
- ensuring that the DSL or a DDSL are always available (during school hours and term time) to discuss any safeguarding concerns and that all staff are clear on who to contact;
- ensure that the role of DSL and DDSL and responsibilities for online safety are explicit in the role holder's job description;
- ensuring that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare;
- ensuring that the Foundation's safeguarding arrangements take into account the procedures and practice of the Cambridgeshire and Peterborough Safeguarding Children Partnership Board and Essex Safeguarding Children Board, including understanding and reflecting local protocols for assessment and the referral threshold document;
- ensuring that the Foundation contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of pupils are identified and support to children subject to child protection plans;
- awareness of the additional risk of harm that SEND pupils may be vulnerable to;
- ensuring that appropriate arrangements are in place to keep children safe, where Foundation premises are let to external organisations or individuals, including inspecting these as required.

6.4. This policy is likely to be subject to ongoing amendments due to changes to legislation. The Foundation recognises that the Governors must be informed of, but not required to formally authorise, all changes to this policy. Significant changes must be authorised by the Governing Body. Minor changes may be authorised by the Senior Leadership Team (SLT), the DSL and the nominated Governor for safeguarding.

7. **KEY FOUNDATION CONTACTS**

The Nominated Governor, Prof Rob Foale, can be contacted via the Bursar's PA on 01223 454 708.

<u>Designated Safeguarding Lead (DSL) with ultimate responsibility - Tracy Handford</u>			
Tracy Handford	tsh@stephenperse.com	Tel: 01223 454700	Tel: 07969 805388

<u>Boarding, Sixth Form and overall Foundation Designated Deputy Safeguarding Lead</u>				
DDSL	Denise Hammersley	dha@stephenperse.com	Tel: 01223 707955	Tel: 07932728510

Nursery and Early Years Safeguarding Lead				
DDSL	Sarah Holyoake	seh@stephenperse.com	Tel: 01954 210309	Tel: 07891 247592
DDSL	Verity Brownbridge	vbr@stephenperse.com	Tel: 01799 522348	Tel: 07891 247522

The Junior School, Fitzwilliam Building				
DDSL	David Hewlett	dhe@stephenperse.com	Tel: 01223 346140	Tel: 07526 176790
DDSL	Jasvir Hegarty	jkh@stephenperse.com	Tel: 01223 346140	Tel: 07903 721569

Dame Bradbury's School				
DDSL	Louise Graham	lgr@stephenperse.com	Tel: 01799 522348	Tel: 07837 680471
DDSL	Claire Matthews	cma@stephenperse.com	Tel: 01799 522348	Tel: 07794 539266

The Stephen Perse Foundation Senior School				
DDSL	Shahzad Rahman	ssr@stephenperse.com	Tel: 01223 454700	Tel: 07984 876458
DDSL	Evelyn Bull	edb@stephenperse.com	Tel: 01223 454700	Tel: 07970852358

Domestic Abuse Leads				
Tracy Handford (3-11)		tsh@stephenperse.com	Tel: 01223 454700	Tel: 07969 805388
Denise Hammersley (11-18)		dha@stephenperse.com	Tel: 01223 707955	Tel: 07932728510
Prevent Leads				
Louise Graham (3-11)		lgr@stephenperse.com	Tel: 01799 522348	Tel: 07837 680471
Shahzad Rahman (11-18)		ssr@stephenperse.com	Tel: 01223 454700	Tel: 07984 876458

<u>Child Sexual Exploitation Champions</u>			
Denise Hammersley	dha@stephenperse.com	Tel: 01223 707955	Tel: 07932 728510
<u>"Looked after children" Leads</u>			
Sara Gustafsson	sgu@stephenperse.com	Tel: 01799 522348	Tel: 07572 644614
Bethan Uden (11-18)	bdu@stephenperse.com	Tel: 01223 454700	
<u>Online Safety Lead</u>			
David Hewlett	dhe@stephenperse.com	Tel: 01223 346140	Tel: 07526 176790

8. PROCEDURES FOR DEALING WITH SAFEGUARDING AND CHILD PROTECTION CONCERNS OR SUSPICIONS OF ABUSE OR NEGLECT

8.1. All action is taken in accordance with the following guidelines:

- a. Keeping Children Safe in Education (DfE 2021)
- b. Working Together to Safeguard Children (DfE 2018, updated December 2020)
- c. PREVENT Duty - Counter Terrorism and Security Act (HMG 2015)
- d. Effective Support for Children and Families in Peterborough and Cambridgeshire (2018)
- e. Essex Safeguarding Children Board Guidelines - the SET Child Protection Procedures (ESCB 2019)
- f. Effective Support for Children and families in Essex (ESCB 2017)

8.2. The Foundation treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children and vulnerable students aged over 18 who may be at risk. All our Foundation staff are made aware of their duty to safeguard and promote the welfare of pupils in the Foundation's care, the safeguarding arrangements in place, the name of the DSL (and deputies) and how to share concerns with them.

8.3. Staff members are alerted to the particular potential vulnerabilities of looked after and previously looked after children. Sara Gustafsson (1-11) and Bethan Uden (11-18) are the appropriate staff members for liaising with virtual school heads for those looked after children in the Foundation. These members of staff have access to, and know how to access, relevant information relating to a looked after child, including contact arrangements with birth parents or those with parental responsibility and care arrangements. In their absence, the relevant DDSL can be contacted and will liaise with virtual school heads. The DSL has details of the child's social worker and the name of the virtual school head in the authority that looks after the child. Where a child ceases to be looked after and becomes a care leaver, the DSL will also have details of local authority Personal Advisor appointed to guide and support that care leaver, and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

9. Initial Suspicion, Allegation or Complaint

9.1. If a member of staff suspects or hears **any** allegation or complaint of exploitation, abuse or neglect from a pupil or any third party, or if knowledge of possible exploitation, abuse or neglect comes to his/her attention, they must follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping pupils safe.

9.2. It is the duty of all staff to listen carefully, avoid asking leading questions, reassure the individual that the allegation/complaint will be taken seriously, not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the pupil) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken. On hearing an allegation of neglect, exploitation or abuse or

complaint about neglect, exploitation or abuse directly from a pupil, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the pupil should be told that the matter will be referred on in confidence to the appropriate people in positions of responsibility.

- 9.3. A pupil should never be given the impression that they are creating a problem by making an allegation or complaint of exploitation, abuse or neglect.
 - 9.4. Staff must keep a sufficient written record of the conversation in MyConcern and note of signs or indicators of abuse (using a body map, if appropriate) completed at the earliest possible time. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence. The record should use names, not initials. The record must be kept secure including due care must be given to the visibility of the screen when completing the record in MyConcern. Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or a DDSL).
 - 9.5. Where the allegation or complaint is made by an adult, the DSL will ask for a written and signed statement from that person and inform them that their evidence may be passed on to a third party. If, after due consideration, the Foundation decides to pass the information onto an outside agency in accordance with this policy, the DSL will contact the disclosing party (unless the Foundation is advised otherwise by that agency) to inform them of this and that they should expect further contact from the agency. All evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be stored securely, preserved, notified and passed on when reporting the matter.
 - 9.6. If any member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in the Foundation, have any concerns about a pupil's welfare, they should act on them immediately. Staff should report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL and submit an accurate written record of the disclosure or concerns. However, any staff member can make a direct referral to children's social care or other external services such as early help services in accordance with the referral threshold set out by the [Cambridgeshire and Peterborough Safeguarding Children Partnership Board](#) or [Essex Safeguarding Children Board](#) (for Dame Bradbury's).
10. Children at immediate danger or at risk of harm
 - 10.1. Where staff have concerns that a child is in **immediate** danger, is at risk of harm or if a crime has been committed, a referral should be made to children's social care and/or the police immediately. **Anyone** can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a referral has been made as soon as possible. Staff must share information with children's social care and/or the police where there are any concerns that a child may be at risk of harm or neglect.
 - 10.2. Referrals should include as much relevant information as possible to allow any assessment by children's social care to consider all the available evidence and enable a contextual approach

to address such harm.

- 10.3. If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact the Local Authority Designated Officer (LADO also known as DO) for advice or direction. The DSL will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the LADO within 24 hours.
- 10.4. For all children who live in Cambridgeshire, the DSL or DDSL will immediately refer cases of suspected abuse or allegations to Children's Services by telephone (see Section 2 for External Contacts) or by completion of an online referral form for [Cambridgeshire](#) or [Peterborough](#), as appropriate to where the child resides.
- 10.5. For all children who live in Essex, the DSL or DDSL will immediately refer cases of suspected abuse or allegations to the Children and Families Hub by telephone (Appendix 5) and in accordance with the procedures outlined in the SET procedures (ESCB, 2017) and in "Effective Support for Children and Families in Essex" (ESCB, 2017). The telephone referral to the Children and Families Hub will be confirmed in writing within 48 hours by completion of the [Children and Families Request for Support form](#). Essential information will include the child's name, address, date of birth, family composition, the reason for the referral, whether the child's parents are aware of the referral plus any other relevant information or advice given.

11. Children in need / early help

- 11.1. The Foundation recognises that there may also be children who, whilst not suffering harm or at immediate risk, may benefit from early help or may require additional support from external agencies. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
 - 11.1.1. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
 - is disabled or has certain health conditions and has specific additional needs;
 - has special educational needs (whether or not they have a statutory education, health and care plan);
 - has a mental health need;
 - is a young carer;
 - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
 - is frequently missing/goes missing from care or from home;
 - is persistently absent from education, including persistent absences for part of the school day;
 - has a family member in prison, or is affected by parental offending;
 - is misusing drugs or alcohol themselves;
 - is at risk of modern slavery, trafficking or exploitation;
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
 - has returned home to their family from care;

- is showing early signs of abuse and/or neglect;
 - is at risk of being radicalised or exploited;
 - is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
 - is a privately fostered child.
- 11.2. Where appropriate, the Foundation may consult with the child concerned and their parents regarding a referral to external agencies (such as children's social care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Family Common Assessment Framework (Family CAF), being carried out. In either case, the Foundation will liaise and take advice from external agencies as appropriate.
- 11.3. Children who are in need of additional support will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern meets the relevant threshold in the [Cambridgeshire and Peterborough SCB Threshold Document \(2018\)](#) or [Effective Support for Children and Families in Essex \(July 2017\)](#) to ensure that children's needs are met at the earliest opportunity - where a child's needs are such that they require a more urgent response, this is provided in a timely and swift manner by high quality services through inter-agency assessment and intervention using the Family CAF.
- 11.4. If a referral is made by telephone, this should be followed up in writing. Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- 11.5. Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the Foundation will follow this up with the children's social care and push for reconsideration where appropriate. Any member of staff who has concerns that a child's situation does not appear to be improving should press for reconsideration.
- 11.6. The Foundation will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with social services and the police.
- 11.7. With regard to the Prevent Duty, the Foundation will co-operate with Channel panels and the Police when assessments are being undertaken. Foundation staff understand how to identify those who might benefit from Channel support and how to make a referral. A flowchart setting out the referral process for Essex is at Appendix 6.
- 11.8. In the case of peer-on-peer abuse which the Foundation has reported to the LADO and which the LADO or statutory child protection authority decides not to investigate further, the matter will be dealt with under the Foundation's Anti-Bullying and Behaviour, Rewards and Sanctions policies, and any other relevant policies, after discussion with the LADO.
- 11.9. Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with the Prevent Lead or DSL without delay. The Prevent Lead or DSL will consult with external agencies, as appropriate in accordance with this policy.

Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care or the police. The Foundation will not discuss any concerns in relation to possible radicalisation without first agreeing with children's social care or the police what information can be disclosed.

- 11.10. For children in need of additional support from one or more agencies, the Foundation will make contact with the relevant external agency and will arrange for any necessary meetings to occur and for in school support. The Foundation's local authority is Cambridgeshire for all schools within the Foundation other than Dame Bradbury's where Essex is the relevant local authority. The points of contact are as follows:

12. EXTERNAL AGENCY CONTACT INFORMATION

The Foundation's points of contact for children who are the focus of concern are as follows:

The telephone numbers for Children's social care are:

Cambridgeshire Direct Contact Centre (Social Care)	Tel: 0345 045 5203
Cambridgeshire Emergency duty Team (out of hours)	Tel: 01733 234724
Essex Direct Contact Centre (Social Care)	Tel: 0345 603 7627
Essex Direct Contact Centre (social Care out of hours)	Tel: 0345 606 1212

Cambridgeshire (all schools apart from Dame Bradbury's)

Cambridgeshire website for child protection	https://www.safeguardingcambspeterborough.org.uk/children-board/
Referral form for children who are believed to be at risk (Cambridgeshire)	https://cambridgeshire-self.achieveservice.com/service/Childrens_Services_online_referral_form
Referral form for children who are believed to be at risk (Peterborough)	https://peterborough-self.achieveservice.com/service/Childrens_Services_online_referral_form
Cambridgeshire named Senior Officer for allegations: Education Adviser -	Tel: 01223 699448
Cambridgeshire Local Area Designated Officer (LADO or DO)	Tel: 01223 727 967
Cambridgeshire Education Child Protection Service	Tel: 01223 703 800

Advice Line	
Cambridge Direct Contact Centre (Social Care)	Tel: 0345 045 5203
Cambridgeshire Emergency Duty Team (out of hours)	Tel: 01733 234 724
Education Safeguarding Team	ECPSGeneral@cambridgeshire.gov.uk
Cambridgeshire Police Child Abuse Investigation Unit	Tel: 101
Early Help Hub (EHH)	Tel: 01480 376 666
Multi-Agency Safeguarding Hub (MASH) - referrals and professional consultation	Tel: 0345 045 5203 MASH.C&F@cambridgeshire.gcsx.gov.uk
Cambridge Assessment and Children in Care Team	Tel: 01223 507255

Essex (Dame Bradbury's)

Essex local authority website for child protection	www.escb.co.uk
Essex North Local Area Designated Officer (LADO or DO) Jacquie Wilkes	Tel: 03330 139 797
Essex Child Protection Referral (Children and Families Hub (CFH))	Tel: 0345 603 7627
Out of hours Emergency Duty Team	Tel: 0345 606 1212
Police Emergency	999
Police Non-emergency	101

Ofsted Safeguarding Children	Tel: 0300 1233155 (Mon-Fri, 8am-6pm)
	Whistleblowing@ofsted.gov.uk
Extremism - Department for Education dedicated helpline for staff and governors	Tel: 020 7340 7264 counter-extremism@education.gsi.gov.uk

Other useful contacts

Disclosure and Barring Service PO Box 181, Darlington, DL1 9FA	Tel: 01325 953 795
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Teaching Regulation Agency	Tel: 0370 000 2288
Forced Marriage Unit	Tel: 020 7008 0151
NSPCC helpline	Tel: 0808 800 5000
NSPCC Report Abuse in Education helpline	Tel: 0800 136 663

13. DESIGNATED SAFEGUARDING LEAD (DSL) AND DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSL) ROLE AND TRAINING

- 13.1. The DSL and DDSLs, named in the table in [section 7](#), have been fully trained for the demands of these roles in child protection and inter-agency working in accordance with the locally-agreed inter-agency procedures and as set out in Annex C of KCSIE 2021. They are typically members of the Senior Leadership Team or deputy head teachers at the Foundation.
- 13.2. The DSL and DDSLs’ training meets the requirements as set out in Annex C of KCSIE 2021.
- 13.3. Both the DSL and DDSLs undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSLs and DDSLs also attend refresher training updated at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their roles. They all have a job description which explicitly details their safeguarding roles and key activities including responsibility for online safety.
- 13.4. The DSL’s role is to take lead responsibility for safeguarding and child protection matters in the Foundation, including online safety. This lead responsibility should not be delegated. The DSL’s responsibility (activities of which may be delegated to a DDSL, provided the lead responsibility remains with the DSL) is to:
- refer cases of suspected abuse to the local authority children’s social care as required;
 - support staff who make referrals to local authority children’s social care;
 - refer cases to the Channel programme where there is a radicalisation concern as required;
 - support staff who make referrals to the Channel programme;
 - refer cases where a person is dismissed or left due to risk/harm to a pupil to the Disclosure and Barring Service as required;
 - refer cases where a crime may have been committed to the Police as required.
 - act as a point of contact with the three safeguarding partners;
 - liaise with the headteacher or principal to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
 - as required, liaise with the “case manager” (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
 - liaise with staff (especially pastoral support staff, the healthcare practitioners, IT Technicians, and SENCOs, or the named person with oversight for SEN in a college and

Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;

- act as a source of support, advice and expertise for all staff;
- ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- ensure that systems are in place, which are well promoted, easily understood and accessible, for children to confidently report abuse;
- ensure the Foundation's child protection policies are known, understood and followed appropriately;
- ensure the Foundation's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the nursery, school, the Sixth Form or boarding house in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that pupils, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these pupils are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that pupils in this group might face and the additional academic support and adjustments that they could make to best support these pupils.

13.5. The DSL and/or the DDSLs can be contacted at any time (during and outside of school hours) for staff in the Foundation to raise or discuss any safeguarding concerns. In the first instance, contact should be made with the DSL or DDSL for the Foundation nursery, school, Sixth Form or boarding house where the pupil is based. If in very exceptional circumstances the DSL and the DDSL are not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the relevant SLT and or taking advice from the relevant Children's Safeguarding Board, as appropriate. In these circumstances, any action taken should be shared with the DSL and/or a DDSL as soon as possible.

13.6. The Foundation has appointed a DDSL for the Early Years Foundation Stage ('EYFS'). In addition to the above duties, the DDSL will ensure that relevant staffing ratios are met, where applicable, and that each child in the EYFS is assigned a key person.

13.7. The DSL maintains close links with the Cambridgeshire and Peterborough LSCB and Essex SCB and reports at least once a year to the Governors on the child protection issues outlined above. The DSL will make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the Foundation and/or the police if a criminal offence is suspected.

13.8. [NPCC - When to call the police](#) should assist the DSL and/or the DDSLs to understand when they should consider calling the police, in relation to incidents on school and college premises where pupils have potentially committed a crime, and what to expect when they do.

14. CHILD'S WISHES

14.1. Where there is a safeguarding concern the Foundation will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The Foundation will operate processes and take actions and decisions which will be led by what is considered to be in the best interests of the pupil.

15. PARENTS

15.1. In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Principal who will decide on the appropriate response. In very few cases, it may not be right to inform parents of our concerns immediately as that action could prejudice any social care/police investigation, or place the child at further risk (for example where allegations of sexual abuse or physical abuse are made against family members or carers or it may lead to the loss of evidence). In such cases, advice will be sought from the LADO or the Children and Families Hub and/or Cambridgeshire/Essex Police in making decisions about when it is appropriate to share information with parents/carers.

15.2. The Foundation will record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, the rationale will be recorded.

16. TRANSPARENCY

16.1. The Foundation prides itself on its respect and mutual tolerance. Parents/guardians/carers have an important role in supporting the Foundation. Copies of this policy, together with our other policies relating to issues of child protection are on our website and available on request and we hope that parents/guardians/carers will always feel able to take up any issues or worries that they may have with the Foundation. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

16.2. The Foundation works with external agencies where appropriate including inter-agency working and attendance at Strategy Discussions.

17. RECORD KEEPING

17.1. Well-kept records are essential to good child protection practice. The Foundation is clear about the need to record any concern held about a pupil or pupils within the Foundation, the status of such records and when these records should be shared with other agencies. Records will be clear, detailed and accurate and will include:

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

If in doubt about recording requirements, staff should discuss with the DSL or a DDSL.

- 17.2. The Foundation records all safeguarding and child protection concerns on MyConcern, a purpose-made, secure platform used for recording and managing safeguarding concerns used by many educational institutions across the UK. All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded on MyConcern. All staff need to ensure that confidentiality protocols are adhered to and information shared appropriately. If in doubt about confidentiality of records/information, staff will seek advice from the DSL or DDSL. Staff may wish to refer to the DfE advice "[Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(July 2018\)](#)".
- 17.3. A separate child protection file, where applicable, is created for each pupil and MyConcern enables the Foundation to view all concerns and referrals relating to each pupil, even if one or more of those concerns relates to or involves other pupils.
- 17.4. Parents do not have an automatic right to access child welfare records and consideration will be given as to what the consequences of information sharing might be. Unless it would place the pupil at risk of significant harm, parents will be informed that a concern has been logged in MyConcern, where it will be stored and what will happen to it when the pupil leaves the setting.
- 17.5. When a child about whom there have been child welfare concerns (whether subject to a child protection plan or not) leaves the Foundation or transfers to another setting, the DSL should ensure that the pupil's child welfare file will be transferred, separately from the main pupil file, to the receiving setting within five days, using the following protocol:
- 17.5.1. The DSL or DDSL will contact the receiving setting by telephone to make them aware that there is a child welfare file and, once sent, ask them to confirm as soon as possible that they have received the file. The relevant Foundation school will keep a record that the file has been received in order to be able to identify its location.
- 17.5.2. Hard copy files: the file will be marked 'confidential, addressee only' and sent to the Designated Person, if known, of the receiving setting. The file will be delivered by hand if possible; otherwise sent by delivery that can be tracked and signed for.
- 17.5.3. Electronic files stored on MyConcern: the file will be transferred securely following the procedure established by MyConcern and with the assistance of the MyConcern support team if required.
- 17.5.4. The Foundation will not keep a copy of transferred records but will keep a record of the current file location and date the file was transferred.

- 17.5.5. If an individual child welfare file cannot be transferred for any reason, the Foundation will archive them for 25 years from the pupil's date of birth¹. In addition to the child welfare file, the DSL should also consider whether it would be appropriate to share any information with the new school or college in advance of a pupil leaving.
- 17.6. All actions and decisions will be led by what is considered to be in the best interests of the pupil and a record of the decision-making process will be kept.
18. CONFIDENTIALITY AND INFORMATION SHARING
- 18.1. Where there are concerns about the safety of a pupil, the sharing of information in a timely and effective manner within and between organisations can reduce the risk of harm. Early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge or where a child is already known to the local authority children's social care.
- 18.2. While the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm, where in the circumstances consent cannot be given or if it cannot be reasonably expected that we obtain consent.
- 18.3. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children or vulnerable adults at risk of abuse or neglect. Generic data flows related to child protection are recorded in our Record of Processing Activities and regularly reviewed. Our Foundation privacy notices accurately reflect our use of data for child protection purposes.
- 18.4. Staff will ensure confidentiality protocols and that relevant and proportionate information is shared appropriately. The setting works within the guidelines set out in the DfE Information Sharing Advice for Safeguarding Practitioners (July 2018).
- 18.5. The DSL or DDSL may disclose any information about a pupil to other members of staff on a 'need to know' basis only.
- 18.6. All staff must be aware that they have a professional responsibility to share relevant and proportionate information with other agencies in order to safeguard children and vulnerable adults.
- 18.7. The Foundation will notify the relevant Social Care Team immediately if:

¹ The national Independent Inquiry into Child Sexual Abuse (the **Inquiry**) has confirmed that all institutions have an obligation to preserve records for the Inquiry for as long as necessary to assist the Inquiry. Archived files which otherwise would have been destroyed in accordance with the Foundation's retention policy set out above, will therefore be kept for at least the duration of the Inquiry and then under review.

- 18.7.1. it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
 - 18.7.2. there is an unexplained absence of a pupil who is subject to a Child Protection Plan;
 - 18.7.3. there is any change in circumstances to a pupil who is subject to a Child Protection Plan.
- 18.8. If a pupil discloses information that may indicate that they are at risk of abuse, exploitation or neglect, the staff member will be clear that they cannot promise to keep the information a secret. The staff member will be honest to the pupil and explain that it will be necessary to tell someone else in order to help them and keep them safe.
- 18.9. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils).
- 18.10. The DSL or DDSLs will aim to gain consent to share information and be mindful of situations where to do so would place a pupil at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a pupil in a timely manner. Parental consent is not required for referrals to statutory agencies such as the police and children's social care when a child is in danger or at risk of harm. The DSL or DDSLs will record decisions made to share or withhold information, who information has been shared with and why.
- 18.11. While the Foundation will share information with those involved where and when it is appropriate to do so, it may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

19. USE OF MOBILE PHONES AND CAMERAS

- 19.1. Neither staff nor pupils may use their own personal cameras or mobile phones to take photographs within the Foundation. Please see the Foundation's policy on taking photographs and videos of pupils on Foundation devices at Appendix 3.

20. ONLINE SAFETY

- 20.1. Staff are all made aware that technology is a significant component in many safeguarding wellbeing issues. Children are at risk of abuse online as well as face to face and that this may take place concurrently via online channels and in daily life.
- 20.2. The Foundation will ensure that:
- 20.2.1. appropriate filters and monitoring systems are in place to keep pupil's safe online. The Foundation uses a Smoothwall firewall for web filtering and monitoring, only essential ports and services are allowed. Such systems aim to reduce the risk of pupils being exposed to illegal, inappropriate and harmful materials online; reduce the risk of pupils being subjected to harmful online interaction with others; and help manage online behaviour that can increase a pupil's likelihood of being subject

to, or causing, harm;

- 20.2.2. pupils are taught about safeguarding, including online safety.
 - 20.2.3. staff receive online safety training, and regular updates, as a part of the safeguarding training and updates.
 - 20.2.4. online safety will be a running and interrelated theme throughout the curriculum and reflected in relevant policies, staff training, the roles and responsibilities of the DSL and DDSs and in parental engagement.
- 20.3. The Foundation carries out an annual review of its approach to online safety, in the context of safeguarding and its compliance with KCSIE 2021, and this is available to staff for their awareness and implementation, where applicable.
- 20.4. The Foundation's Technology Acceptable Use policies for staff and students and the Online Safety Policy also set out the Foundation's approach to online safety and are reviewed annually.

21. SUPPORTING CHILDREN

- 21.1. The Foundation recognises that **any** child or vulnerable adult may be subject to abuse and neglect and as such will support all our pupils. The Foundation recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety (contextual safeguarding).
- 21.2. Staff will be made aware that safeguarding issues can manifest themselves in many ways and can often overlap with one another. Some behaviours linked to drug taking, alcohol abuse, truanting, gender based violence and sexting also put pupils in danger.

22. WHAT IS CHILD ABUSE?

- 22.1. The DfE advice: ['What to do if you are worried a child is being abused - Advice for Practitioners'](#) should be referred to by all staff in raising their awareness of and helping them to identify the signs of child abuse. [The NSPCC website](#) also provides helpful information on types of abuse and what to look out for which staff are encouraged to refer to. Please see Appendix 1 for types of abuse and neglect.

- 22.2. Annex B of KCSIE 2021 identifies the following specific safeguarding issues:

- child abduction and community safety incidents
- children and the court system
- children missing from education
- children with family members in prison
- child sexual exploitation
- child criminal exploitation: county lines
- modern slavery

- cybercrime
- domestic abuse
- homelessness
- so-called 'honour-based' abuse including FGM and Forced Marriage
- preventing radicalisation
- the Prevent duty
- additional support for the Prevent duty
- peer on peer abuse
- sexual violence and sexual harassment between children in schools and colleges

22.3. CHILDREN AT RISK OF RADICALISATION AND THE PREVENT DUTY

- 22.3.1. We recognise that it is a key role of the Foundation to support children and that the Foundation may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination. The Foundation has regard to "The Prevent Duty, Departmental advice for schools and childcare providers (DfE, June 2015) and the "Revised Prevent Duty Guidance: For England and Wales" (HM Government, July 2015).
- 22.3.2. Page 133 of KCSIE 2021 defines 'radicalisation' as '*the process by which a person comes to support terrorism and forms of extremism.*' It refers to the definition of 'extremism' as '*vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.*'
- 22.3.3. Staff acknowledge the need for a culture of vigilance to be present in the Foundation to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation and may need help or protection. However, the Foundation acknowledges that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people. Staff should make reference to information available on the [Let's Talk About It](#) website which provides practical help and guidance to identify signs of radicalism.
- 22.3.4. Staff will consider the level of risk to identify the most appropriate referral. In the first instance, if a member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism they should speak with the DSL/Prevent Lead. A referral could include reference to Channel or Children's Social Care. The Foundation, in recognition that pupils may be at risk of being drawn into terrorism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Principal, DSL and DDSLs and Governors responsible for safeguarding to ensure the Foundation's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.
- 22.3.5. The Foundation seeks to address its Prevent duty through risk assessment, working in partnership with local partners and other agencies, staff training and IT policies. The Foundation ensures that pupils' exposure to potential risks while using the internet is limited

by having in place age appropriate filtering and monitoring systems. The Foundation uses a Smoothwall firewall for web filtering and restricts access for pupils to only essential ports and services.

22.3.6. If there is significant immediate risk of a child being drawn into terrorism; call 999, otherwise a referral can be made using the usual referral form marking on the form that it is a 'prevent referral'. A copy should also be sent through to MASH (mash.cp@cambs.pnn.police.uk) or call them directly using the number in the Key External Contacts section at the beginning of this policy. Advice and support can also be sought from the police using the contact details in the Key External Contacts section.

22.3.7. The Prevent Leads for the Foundation are Louise Graham (3-11) and Shahzad Rahman (11-18).

22.4. ADDITIONAL SUPPORT (PREVENT DUTY)

22.5. The DfE has issued further advice "Protecting children from radicalisation: the prevent duty" for schools on the Prevent duty which is intended to complement the Prevent guidance and signposts to other sources of advice and support.

22.6. CHILDREN MISSING FROM EDUCATION

22.6.1. A child going missing from education, particularly on repeat occasions, is a potential indicator and can act as a vital warning sign, of a range of safeguarding possibilities including abuse, neglect, risk of radicalisation, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of travelling to conflict zones, a risk of FGM or forced marriage. Unauthorised absences from the Foundation will be managed in accordance with the Children Missing from Education Policy.

22.6.2. The Foundation will monitor all pupil absences and promptly address concerns about patterns of absence with the parent/guardian/carer. The Foundation endeavors to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern. A pupil who fails to attend the Foundation regularly or has been absent from the Foundation without the Foundation's permission for a continuous period of 10 school days or more will be reported to the local authority. Similarly, attendance concerns in the boarding environment - such as a student not returning as planned from an exeat without a clear explanation or if there are concerns about the supervision of a student during the holidays - should be raised with the relevant DDSL. For further details on when the Foundation has a duty to report to the local authority, please see the Foundation's Children Missing from Education Policy.

22.7. ELECTIVE HOME EDUCATION

22.7.1. Where a parent/guardian has expressed their intention to remove a child, of compulsory school age from the Foundation with a view to educating at home, the Foundation will, wherever possible, work with the relevant local authority and other key professionals, to coordinate a meeting with the parents/guardians to ensure that the parents/guardians have

considered what is in the best interests of each child.

22.8. CHILDREN MISUSING DRUGS OR ALCOHOL

22.8.1. The discovery that a pupil is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the Foundation will consider such action when there is evidence or reasonable cause:

- To believe the pupil's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse;
- Where the misuse indicates an urgent health or safeguarding concern;
- Where the pupil is perceived to be at risk of harm through any substance-associated criminality.

22.9. CHILDREN LIVING WITH SUBSTANCE MISUSING PARENTS/CARERS

22.9.1. Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic abuse.

22.9.2. When the Foundation receives information about drug and alcohol abuse by a pupil's parents/carers they will follow appropriate procedures.

22.9.3. This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children;
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers;
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour;
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance;
- Disturbed moods as a result of withdrawal symptoms or dependency;
- Unsafe storage of drugs and/or alcohol or injecting equipment;
- Drugs and/or alcohol having an adverse impact on the growth and development of an unborn child.

22.10. CHILDREN LIVING WITH DOMESTIC ABUSE

22.10.1. Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

- 22.10.2. The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.
- 22.10.3. The Foundation recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the abuse continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.
- 22.10.4. Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).
- 22.10.5. Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The Foundation will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.
- 22.10.6. The Foundation works in partnership with Cambridgeshire Police (and Essex Police for Dame Bradbury's) to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass. Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents, where a pupil of the Foundation has been present, with the Foundation's DSL and/or the Domestic Abuse Leads.
- 22.10.7. On receipt of any information, the DSL/Domestic Abuse Lead will decide on the appropriate support the child may require.
- 22.10.8. All information sharing and resulting actions will be undertaken in accordance with the 'Operation Encompass Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse - Notifications to Schools, Colleges and Early Years settings' and equivalent guidance provided Operation Encompass in Essex.

22.11. CHILDREN AT RISK OF CHILD SEXUAL EXPLOITATION

- 22.11.1. Child Sexual Exploitation (**CSE**) is a form of child abuse, which can happen to boys and girls from any background or community.
- 22.11.2. The Foundation has adopted the definition of CSE from the DfE's guide, "Child sexual exploitation Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation" (February 2017):

"Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or

facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.”

- 22.11.3. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- 22.11.4. The Foundation recognises that children who are victims of CSE may go missing from education. The Foundation staff are alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and will take appropriate action to respond to any concerns which will be managed in accordance with this policy. The DSL is the named CSE Lead in school on these issues and will work with other agencies as appropriate.
- 22.11.5. The DSL or the DDSL, as appropriate, will complete the relevant SCB Child Exploitation Risk Assessment and refer to the Multi-Agency Safeguarding Hub (MASH) if there is a concern that a young person may be at risk.

22.12. SERIOUS VIOLENCE

- 22.12.1. There are indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions may also indicate that children have been approached by, or involved with, individuals associated with criminal networks or gangs. Staff will refer to the ‘Preventing youth violence and gang involvement’ and the ‘Criminal exploitation of children and vulnerable adults: county lines’ Home Office guidance.

22.13. CHILDREN AT RISK OF SO-CALLED 'HONOUR BASED' ABUSE ('HBA')

- 22.13.1. So-called HBA encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community and can include forced marriage and Female Genital Mutilation (**FGM**). All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL (or DDSL). Foundation staff will be alert to possible indicators of HBA. Guidance on the warning signs of HBA can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM, April 2016](#) (updated October 2018) and pages 13-14 of the [Multi-agency practice guidelines: Handling cases of forced marriage, 2014](#). Pages 32-36 focus on the role of schools and colleges.

22.14. FGM

- 22.14.1. FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. FGM is illegal in the UK. It is frequently a very traumatic and violent act for the victim and can have serious and harmful long-term psychological and physical effects (Multi-agency statutory guidance on FGM, April 2016 (updated July 2020).

- 22.14.2. All staff should speak to the DSL (or DDSL) with regard to any concerns about FGM.
- 22.14.3. Non-teaching staff, who are not subject to the mandatory reporting duty detailed below, have a general responsibility to report cases of FGM as a safeguarding concern in accordance with the procedures detailed in this policy.
- 22.14.4. All teachers (along with social workers and healthcare professionals) in England and Wales have a statutory duty to report to the police where they discover (either through disclosure by the victim or by observing physical signs) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.
- 22.14.5. For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):
- planning and preparing lessons and courses for pupils;
 - delivering lessons to pupils;
 - assessing the development, progress and attainment of pupils; and
 - reporting on the development, progress and attainment of pupils.
- 22.14.6. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Head of School or Principal to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.
- 22.14.7. If teachers have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols. For Cambridgeshire (all schools in the Foundation apart from Dame Bradbury's) the link is <http://www.safeguardingcambspeterborough.org.uk/children-board/>. For Essex (Dame Bradbury's) the link is www.escb.co.uk.
- 22.14.8. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL (or DDSL) and involve children's social care as appropriate. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes. Information on when and how to make a report can be found at [Mandatory reporting of female genital mutilation: procedural information](#), April 2015 (updated January 2020).
- 22.14.9. The police child abuse investigation unit telephone number is: 101.

22.15. MENTAL HEALTH

- 22.15.1. All Foundation staff are made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. A number of staff have been trained in Youth Mental Health First Aid by Mental Health First Aid (MHFA) (England). The Foundation is following the new Relationships Education, Relationships and Sex Education (RSE) curriculum, which enables schools to promote the

mental development of pupils at school, and support them to develop resilience, to know how and when to ask for help, and to know where to access support.

22.15.2. The Foundation recognises that where children have suffered exploitation, abuse, neglect, and/or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood and is recognised as an area of vulnerability. Staff are made aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL and/or a DDSL.

22.15.3. Further information can be found in the DfE guidance [Mental Health and Behaviour in Schools](#), (November 2018) and the Foundation's Mental Health and Relationships and Sex Education policies.

22.16. CHILDREN WHO HAVE RETURNED HOME TO THEIR FAMILY FROM CARE

22.16.1. The Foundation recognises that a previously looked after child potentially remains vulnerable. The Foundation will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures' (for Cambridge schools) and the ESCB SET Procedures for Dame Bradbury's.

22.17. CHILDREN SHOWING SIGNS OF ABUSE AND/OR NEGLECT

22.17.1. The Foundation recognises that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

22.17.2. The Foundation will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy. The definitions of the four categories of abuse are attached (see Appendix 1).

22.18. CHILDREN WITH DISABILITIES, SPECIAL EDUCATIONAL NEEDS OR PHYSICAL HEALTH ISSUES

22.18.1. The Foundation recognises that children with special educational needs, disabilities or certain health conditions can face additional safeguarding challenges and that additional barriers can exist when recognising abuse and neglect in this group of children. We recognise that, statistically, children with special educational needs, emotional and behavioural difficulties and other disabilities or certain medical conditions are most vulnerable to abuse including peer on peer abuse.

22.18.2. All staff also need to be alert to the specific needs of those pupils who have special educational needs, disabilities, and/or other physical health issues. Staff will not assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration. Those with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL or DDSL as appropriate.

22.19. YOUNG CARERS

22.19.1. The Foundation recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

22.19.2. The Foundation will seek to identify young carers, offer additional support internally, signpost to external agencies, be particularly vigilant to the welfare of young carers and follow the procedures outlined in this Policy, referring to Early Help or Social Care as required if concerns arise.

22.20. CHILDREN AT RISK OF CHILD CRIMINAL EXPLOITATION (CCE)

22.20.1. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

22.20.2. Criminal exploitation of children is a form of abuse that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

22.20.3. The Foundation will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

22.20.4. The DSL and DDSLs will complete the relevant Safeguarding Partnership Board's Child Risk Assessment and refer to social care if there is a concern that a young person may be at risk of criminal exploitation.

22.20.5. The Foundation recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure an appropriate response to children and young people who go missing, particularly on repeat occasions.

22.21. PRIVATELY FOSTERED CHILDREN

- 22.21.1. Private fostering is when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.
- 22.21.2. The Foundation will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

22.22. CHILDREN WHO HAVE FAMILY MEMBERS IN PRISON

- 22.22.1. The Foundation is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child or young person.
- 22.22.2. The Foundation recognises that children or young people with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.
- 22.22.3. The Foundation will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.
- 22.22.4. The Foundation will work with the family and the child or young person to minimise the risk of the child not achieving their full potential.

22.23. PEER ON PEER ABUSE INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

- 22.23.1. The Foundation recognises that children are capable of abusing their peers. Peer on peer abuse can manifest itself in many ways. This can include but is not limited to:
- bullying, including cyberbullying, prejudiced-based and discriminatory bullying;
 - abuse in intimate personal relationships between peers;
 - physical bullying which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence and sexual harassment;
 - consensual and non consensual sharing sexual images (including nude and semi nude images/videos, also known as 'sexting' or 'youth produced sexual imagery');
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - 'upskirting', a criminal offence, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- 22.23.2. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

22.23.3. Please see Appendix 3 and the Foundation's separate Anti-Bullying Policy for further information.

23. **PROMOTING A PROTECTIVE ETHOS**

23.1. The Foundation's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the Foundation. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in the Foundation's Behaviour, Rewards and Sanctions Policy and in enforcing the Foundation's Anti-Bullying Policy.

23.2. As part of the PSHEE, including the Relationships (for all primary aged pupils) and Relationships and Sex Education for all secondary pupils) curriculum, pupils will be taught personal safety skills commensurate with their age, ability and need. This includes how to recognise if they are feeling unsafe, how to ask for help and how to manage risk including in a digital context.

23.3. Time is also allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding.

23.4. All pupils know that there are adults to whom they can turn to if they are worried, including the Foundation counsellor and pastoral leaders. Details of the Foundation's Independent Listener for boarding and external sources of support are made available to boarding students on posters displayed in relevant Foundation buildings. If the Foundation has concerns about a pupil there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions.

23.5. **INDUCTION AND TRAINING**

23.5.1. All staff receive appropriate safeguarding and child protection training which is integrated, aligned and considered as part of the whole Foundation approach and wider staff training and curriculum planning. This is regularly reviewed and updated in line with advice from the Cambridgeshire and Peterborough and Essex Safeguarding Boards.

23.5.2. Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the Foundation, receives appropriate induction training on their responsibilities in being alert to the signs of abuse and neglect, bullying or children at risk of radicalisation, their responsibility to provide a safe environment in which a child can learn, their role in the early help process and on the procedures for recording and referring any concerns to the DSL or DDSL at each school and, if required, to the main points of local procedures of Cambridgeshire and Peterborough/Essex Local Authorities to which referrals are made or, in certain circumstances, the police. Child Protection training is also given to

new governors and volunteers.

23.5.3. Training in child protection and safeguarding is an important part of the induction process and includes the following elements:

- Safeguarding and Child Protection basic awareness training including the role and the names of DSL and DDSLs
- Prevent training (including referrals to Channel programmes)
- Prevent e-learning (*online: before starting work*) - <https://www.elearning.prevent.homeoffice.gov.uk/m/screen1>
- Keeping Children Safe in Education received and relevant Part 1/Annex A, as appropriate, and Annex B read (*must be signed before starting work*)
- Keeping Children Safe in Education Quiz
- Guidance for safer working practice for those working with children and young people in education settings (2019) received
- Code of Conduct for All Staff Working with Young People, which includes reference to maintaining appropriate staff and pupil relationships and communication with students
- Staff Technology Acceptable Use including E-Safety
- Behaviour, Rewards and Sanctions Policy
- Online Safety
- Whistleblowing Policy
- EYFS-specific (in consultation with Leader of EYFS: see separate record, to include EYFS safeguarding, ratios, and use of mobile phones etc)
- Safeguarding response to children who go missing in education (Children Missing in Education Policy)
- Managing a report of child on child sexual violence and sexual harassment

23.5.4. Training also promotes staff awareness of child sexual exploitation, so called 'honour based' abuse, forced marriage and female genital mutilation. Training on the early help process and process for making a referral to children's social care and for statutory assessment that may follow a referral (including what role they may be expected to play in such an assessment) will also be provided, together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

23.5.5. Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action *without delay* if such a practice is suspected.

23.5.6. All staff receive safeguarding and child protection updates, including online safety, as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively, including looked after and previously looked after children.

23.5.7. The DSL and DDSLs undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSL and the DDSLs also receive regular updates, including informal updates, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role.

23.5.8. Designated Safeguarding Governors receive regular safeguarding and child protection training with the Local Authority and updates, including informal updates through Committee Meetings.

23.6. SAFER EMPLOYMENT PRACTICES

23.6.1. The Foundation follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. Please also see the Foundation's Safer Recruitment, Recruitment Pack, Induction Policy and Code of Conduct for All Staff Working with Young People.

23.6.2. In line with Part 3 of KCSIE 2021, the governing body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that, where relevant and required, their staff have been suitably vetted in line with legal requirements.

23.7. STAFF OBLIGATIONS

23.7.1. All staff in the Foundation are required to notify the Foundation immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration.

23.7.2. The Foundation takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify their manager and Human Resources immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

23.8. PROCEDURES FOR MANAGING ALLEGATIONS OF ABUSE AGAINST STAFF, CONTRACTORS VOLUNTEERS, THE HEADS OF SCHOOL AND PRINCIPAL

23.8.1. The Foundation's procedures for dealing with allegations against any staff member (including supply staff, volunteers and contractors) aims to strike a balance between the need to protect children from abuse and the need to protect staff, contractors and volunteers from vexatious allegations. The Foundation will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. The Foundation will have regard to Part 4 of KCSIE 2021.

23.8.2. The Foundation will liaise with the LADO, police and social services as to managing confidentiality as appropriate.

23.8.3. The Principal (or Chair of Governors, where applicable) will ensure that the Foundation consults the LADO within one working day and the LADO will advise on all further action to be taken. Before contacting the LADO, the Foundation should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any

foundation to the allegation, being careful not to jeopardise any future police investigation.

- 23.8.4. Where the Foundation identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, children's social care and the police will be contacted immediately.
- 23.8.5. The Foundation's procedures for managing allegations against staff (including the Principal, Head of Schools and DSL and DDSLs) and volunteers follows DfE guidance and Cambridgeshire and Peterborough/Essex SCB arrangements and apply when staff, including supply staff, volunteers and contractors, working in the Foundation have (or are alleged to have):
- Behaved in a way that has harmed a child, or may have harmed a child;
 - Possibly committed a criminal offence against or related to a child;
 - Behaved towards a child in a way that indicated that they may pose a risk of harm to children; or
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 23.8.6. Any allegations of abuse against staff (including supply staff), contractors and volunteers) should be referred immediately to the Principal and the DSL. The Principal or the DSL will contact the LADO as soon as is practicable. Before contacting the LADO, basic enquiries will be conducted in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.
- 23.8.7. Should the allegation of abuse concern the DSL, the member of staff should inform the Principal and the DDSL who will act in the place of the DSL. Should the allegation be against the Principal or School Governor the Chair of Governors should be informed, who will discuss this with the DSL, without the Principal or School Governor being informed first. It will be the Chair's responsibility to contact the LADO (see external agency contact information above). If the allegation is against the Chair of Governors, the LADO should be contacted directly without the governors being informed first.
- 23.8.8. The Foundation will also inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere) and the action taken in respect of the allegations, as soon as is reasonably practicable and within 14 days of the allegations being made at the latest.
- 23.8.9. The Foundation will ensure that any disciplinary proceedings against staff or volunteers relating to child protection matters are concluded in full even when the member of staff or volunteer is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- 23.8.10. Staff or volunteers who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is

deemed to be the best way to ensure that children are protected.

- 23.8.11. Where the Foundation is considering an allegation against an individual not directly employed by them, where the disciplinary procedures do not fully apply, the Foundation will ensure that allegations are dealt with properly. The Foundation will not cease to use a supply teacher, or contracted staff provided by an employment agency or business, without finding out the facts and liaising with the LADO to determine an appropriate outcome. The Foundation will discuss with the agency whether it is appropriate to suspend the supply teacher, or the contracted member of staff, or redeploy them to another part of the school, whilst an investigation is carried out.
- 23.8.12. Consideration must be given to the welfare of the child(ren) concerned and a recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.
- 23.8.13. The Foundation will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019). As part of the Induction process, all staff, paid and unpaid, receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.
- 23.8.14. The school will ensure that staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).
- 23.8.15. The Foundation will ensure that communication between pupils and adults, by whatever method, is transparent and takes place within clear and explicit professional boundaries and is open to scrutiny.
- 23.8.16. The paragraph below applies to all school sites apart from Dame Bradbury's Where an allegation of abuse is made against staff (including supply staff), volunteers or contractors the Principal or Chair of Governors will contact the Cambridgeshire Local Authority Named Senior Officer - Chris Meddle on 01223 703564 (see external agency contacts above) - who will consult with the LADO. In normal circumstances the Principal or Chair of Governors should not seek to interview the child/ren or member/s of staff involved until advice has been sought as to do so may compromise any police interviews that may be necessary.
- 23.8.17. The paragraph below applies to Dame Bradbury's Where an allegation of abuse is made against staff (including supply staff), volunteers or contractors the SET procedures (ESCB, 2017) will be followed. The Principal or Chair of Governors must inform the LADO in the Children's workforce Allegations Management Team on 03330 139 797 immediately (see above external agency contact information). Advice can then be given on how to proceed and whether the matter requires police involvement.

- 23.8.18. If the allegation concerns a member of staff (including supply staff), a contractor or a volunteer, he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The Foundation will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case. In the case of a staff member who is not employed by the Foundation, the Foundation will keep the agency informed.
- 23.8.19. The outcome of an investigation of an allegation will record whether it is substantiated (sufficient evidence to prove the allegation), unsubstantiated (insufficient evidence either to prove or disprove the allegation), unfounded (no evidence or proper basis which supports the allegation being made), false (sufficient evidence to disprove the allegation) or malicious (sufficient evidence to disprove the allegation and there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to what information can be disclosed. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references.
- 23.8.20. In accordance with KCSIE 2021, the possible risk of harm to children posed by an accused person should be evaluated and managed and in some cases this may require the suspension of the staff member. Suspension should only be considered where there is a cause to suspect a child or children at the Foundation is/are at risk or harm or the case is so serious that it might be grounds for dismissal. The reasons and justification for suspension will be recorded and the staff member informed of them.
- 23.8.21. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. The alternative accommodation may be of a different standard and location to the accommodation that the member of staff normally resides in.
- 23.8.22. The Foundation recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The Foundation will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.
- 23.8.23. During the course of the investigation, the Foundation, in consultation with the LADO, will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision, due consideration will be given to the provisions in the Education Act 2011 and in KCSIE 2021 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.
- 23.8.24. Allegations against a member of staff who is no longer at the Foundation (including historical allegations) should be referred to the police.

- 23.8.25. Any pupils who are involved will receive appropriate care.
- 23.8.26. Staff should have regard to the Foundation's Code of Conduct for All Staff Working with Young People to minimise the risk of allegations being made.

23.9. LOW-LEVEL CONCERNS

- 23.9.1. Staff may have low-level concerns which, for the purposes of the Foundation's policies, is defined as any concern about an adult's behaviour towards a child that does not meet the threshold for being considered an allegation, or is otherwise not serious enough to consider a referral at the time of its reporting.
- 23.9.2. All staff have a responsibility to report to the Principal, or the Vice Principal, who is also the DSL, if they suspect that an adult may have acted in a manner which is not consistent with the Foundation's Code of Conduct for All Staff Working with Young People and/or relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children. Staff should have regard to the Foundation's Low Level Concerns Policy for further information.

23.10. WHISTLEBLOWING

- 23.10.1. If staff and volunteers have concerns about poor or unsafe practices or potential failures in the Foundation's safeguarding regime, these should be raised in accordance with the Foundation's Whistleblowing Policy. Concerns regarding the behaviour of colleagues, including supply staff, contractors and volunteers, which are likely to put pupils at risk of abuse or other serious harm may be dealt with in accordance with the Foundation's Managing Allegations of Abuse against Staff procedure (see above). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.
- 23.10.2. If staff and volunteers feel unable to raise an issue with the Foundation or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC Whistleblowing Advice Line (tel: 0800 028 0285 or email: help@nspcc.org.uk).

23.11. EXTERNAL REFERRALS

- 23.11.1. We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to the involvement of the LADO. The Foundation, therefore, has a legal duty to make a referral to the DBS where we remove an individual from regulated activity (or would have removed an individual had they not left) - paid or unpaid - and we believe that the individual has:

- engaged in relevant conduct in relation to children and/or adults;
- satisfied the harm test in relation to children and/or vulnerable adults; and

- received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence .

- 23.11.2. The Foundation will, in accordance with KCSIE 2021, make such a referral as soon as possible, and ordinarily on conclusion of an investigation, when an individual (whether employed, contracted, a volunteer or a student) is removed from regulated activity because they are considered unsuitable to work with children. This could include dismissal, suspension, redeployment to work that is not regulated activity, non-renewal of a fixed term contract, no longer using supply teachers engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.
- 23.11.3. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and the Foundation should ensure that there is sufficient information to meet the referral duty criteria explained in the DBS referral guidance, available on [gov.uk](https://www.gov.uk).
- 23.11.4. The Foundation will make a referral even if a significant period of time has passed between the allegation and the gathering of evidence to support a decision to make a referral.
- 23.11.5. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the Foundation will consider making a referral to the Teaching Regulation Agency (**TRA**) as required by sections 141D and 141E of the Education Act 2002 and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.
- 23.11.6. The Foundation will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.
- 23.11.7. Should non recent allegations of child abuse be made against a staff member (including supply staff), a contractor or a volunteer who is no longer working at the Foundation , the Foundation will, in accordance with KCSIE 2021, report the matter to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the police. All allegations of non recent abuse should be referred to the Principal or DSL straight away.

23.12. POSITION OF TRUST

- 23.12.1. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

23.12.2. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer to the Foundation's Staff Handbook, the Code of Conduct for All Staff Working with Young People and the Online Safety Policy.

24. MONITORING AND EVALUATION OF THIS POLICY

24.1. The Foundation monitors and evaluates its safeguarding policy and procedures through the following activities:

- Governing Body visits to the Foundation;
- Senior Leadership Team discussion sessions with children and staff;
- Frequent scrutiny of attendance data;
- Regular analysis of a range of risk assessments;
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the Foundation;
- Frequent scrutiny of Governing Body meeting minutes;
- Logs of bullying and/or racist or otherwise discriminatory behaviour incidents are reviewed regularly by the Senior Leadership Team and the Governing Body;
- Regular review of parental concerns and parental questionnaires;
- Regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after school;
- Regular review of training offered to staff, including e-safety training; and
- Attending safeguarding annual conferences.

Authorised by: Professor Rob Foale (Designated Safeguarding Governor) prior to authorisation from the Chair of Governors

Date: 5 October 2021

Date of next review: September 2022 (or earlier as required)

APPENDIX 1 (From KCSIE 2021) TYPES OF ABUSE AND NEGLECT

1. TYPES OF ABUSE

- 1.1. KCSIE 2021 defines the following types of abuse, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.
- 1.2. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.
- 1.3. Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 1.4. Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1.5. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
 - 1.5.1. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting

or sexually harassing a single child or group of children. Sexual violence is sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include consensual and non-consensual sharing of nude and semi-nude images and videos and videos (often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

- 1.6. Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

APPENDIX 2

1. GENERAL INDICATORS OF ABUSE

- Significant changes in behaviour without explanation
- Deterioration in work
- Poor attendance at school
- Low self esteem
- Withdrawn
- Running away
- Self Harm
- Fear of parents being contacted
- Extremes of passivity or aggression
- Aggressiveness, anger, anxiety, tearfulness

2. PHYSICAL ABUSE

2.1. Physical indicators may include:

- Bruises/marks – on soft parts of the body e.g. cheeks, forearm (in defence), hips, stomach, upper arms, shoulders and neck
- Bruises/marks that carry the imprint of an implement or hand
- Bruises on any site, of any size, in a pre-mobile baby or a child who is not independently mobile²
- Bite marks, burns/scalds, weals
- Unexplained recurrent injuries, burns or bruises
- Untreated injuries

3. Behavioural indicators may include:

- Refusal to discuss injuries or improbable explanations
- Flinching from physical contact
- Acceptance of excessive punishment
- Pattern of absences which may serve to hide bruises or other physical injuries
- Wearing clothes that may cover bruises, particularly in hot weather
- Fear of undressing for PE, for example
- Aggression towards others
- Over compliant behaviour or a 'watchful attitude'

4. Common sites for accidental injury

Forehead	Forearm	Nose	Hips	Chin
Knees	Spine	Shins	Elbows	

² See the [NICE guideline](#) 'When to Suspect Child Maltreatment (Clinical Guideline 89, updated October 2017)' and the [Bruising In Pre-Mobile Babies: A Protocol for Assessment, Management And Referral By Professionals](#)

5. **Common sites for non-accidental injury**

- Eyes: bruising/black (particularly both eyes)
- Skull: fracture, bruising/bleeding under skull (from shaking)
- Cheek/side of face: bruising/finger marks
- Mouth: torn frenulum
- Neck: bruising/grasp marks
- Shoulders: bruising/grasp marks
- Chest: bruising/grasp marks
- Upper or inner arms: bruising/grasp marks
- Back, buttocks, thighs: linear bruising (outline of belt/buckles) scalds/burns
- Genitals: bruising
- Knees: grasp marks

6. **Under S58 of the Children Act 2004:**

- 6.1. The term “reasonable punishment” was brought in to replace the term “reasonable chastisement”. The law states that it is unlawful for a parent or carer to smack their child unless the smack constitutes “reasonable punishment”.
- 6.2. The decision about whether the smack is “reasonable” will depend on the circumstances but will take into consideration factors like the age of the child and the nature of the punishment.
- 6.3. Physical punishment will be considered “unreasonable” if it leaves a mark on the child or an implement is used.

7. **SEXUAL ABUSE**

7.1. **Behavioural Indicators may include:**

- Provocative sexual behaviour, overly affectionate
- Sexual awareness inappropriate to the child’s age – shown, for example, in drawings, language, games etc
- Asking other children to behave sexually or play sexual games
- Sexualises non-sexualised objects or events
- Regression to younger behaviour, e.g. bed wetting, thumb sucking
- Refusing to stay with or avoid being left alone with certain people or go to certain places
- Frequent public masturbation
- Over-compliant behaviour
- Tries to tell about abuse through hints or clues
- Self harm

7.2. **Physical Indicators may include:**

- Soreness in the genital or anal areas
- Unusual discharge
- Persistent urinary tract infection
- Tiredness, lethargy, listlessness
- Underage pregnancy particularly where the girl is not known to have a boyfriend

- Sexually transmitted infections

7.3. **EMOTIONAL ABUSE**

7.3.1. **Physical Indicators may include:**

- Delays in physical development
- Self harm
- Sudden speech disorders
- Physical complaints with no medical basis

7.3.2. **Behavioural Indicators may include:**

- Excessively withdrawn
- Delays in intellectual development
- Continual self-deprecation
- Negative statements about self
- Over-reaction to mistakes
- Fearful or anxious about doing something wrong
- 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends
- Desperate attention seeking behaviour

7.3.3. **Family or Parental behaviour:**

- Mental ill-health – suicide attempts, depression, threats
- Domestic Abuse
- Alcohol and drug abuse
- Blames or puts down child
- Humiliate their child, name-calling or negative comments
- Cold and rejecting
- Indifferent to child's problems or welfare
- Withholds affection
- Shows preferential treatment when there is more than one child in the family

7.4. **NEGLECT**

7.4.1. **Physical indicators may include:**

- Constant hunger and tiredness
- Underweight or obesity
- Poor personal hygiene
- Inadequate or poor state of clothing
- Poor skin or hair tone
- Not receiving basic health care

7.4.2. **Behavioural indicators may include:**

- Social isolation
- Frequent lateness or non-attendance at school
- Destructive tendencies
- Poor relationships with peers
- Scavenging and scrounging

7.4.3. **Parental behaviour**

7.4.3.1. **Neglect is often characterised by parents “omitting” to care appropriately for their children:**

- Leaving them at home when they are too young to care for themselves
- Exposing children to dangerous situations
- Putting their own needs before those of their children
- Leaving them with inappropriate carers
- Failing to provide adequate shelter, food or clothing
- Failing to seek medical treatment when children are ill or injured

APPENDIX 3 - Peer on Peer abuse including sexual harassment and violence

1. Introduction

- 1.1. The Foundation recognises that children are capable of abusing their peers. Peer on peer abuse can manifest itself in many ways. This can include but is not limited to:
 - bullying, including cyberbullying, prejudiced-based and discriminatory bullying;
 - abuse in intimate personal relationships between peers;
 - physical bullying which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence and sexual harassment;
 - consensual and non consensual sharing sexual images (including nude and semi nude images/videos, also known as sexting or youth produced sexual imagery);
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
 - 'upskirting', a criminal offence, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- 1.2. All peer on peer abuse is unacceptable and will be managed in accordance with this policy and must be taken seriously. The Foundation operates a zero tolerance approach to abuse. Behaviour should not be dismissed as being normal between young people, as "banter", "just having a laugh" or simply "part of growing up".
- 1.3. The Foundation recognises the different gender issues that can be prevalent in peer on peer abuse, for example, girls being sexually touched or boys being subjected to initiation/hazing type violence and rituals.
- 1.4. Peer on peer abuse, such as a bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm and will warrant a response under these procedures. Certain behaviours will need to be handled with reference to other policies in school such as the Behaviour, Rewards and Sanctions policy, Anti- Bullying policy, the Technology Acceptable Use Policy and the Online Safety policy.
- 1.5. The Foundation acknowledges that, even if there are no reports in our setting, it does not mean it is not happening.
- 1.6. This appendix concentrates on peer on peer abuse in the context of sexual harassment and sexual violence. It is compliant with the statutory guidance on peer-on-peer abuse as set out in KCSIE 2021 and should be read in conjunction with the Local Safeguarding Children Board's (LSCB) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

2. Sexual violence and sexual harassment between pupils

- 2.1. Sexual violence and sexual harassment are never acceptable and will not be tolerated.
- 2.2. Sexual violence and sexual harassment can occur between two children of any age or sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual harassment may occur online and offline.
- 2.3. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.
- 2.4. The Foundation follows Part Five of KCSIE 2021, the DfE advice on [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges, May 2018](#) and the [Sharing Nudes and Semi Nudes: Advice for Education Settings Working with Children and Young People](#), the production of which has been coordinated by the UK Council for Internet Safety in partnership with the National Police Chiefs Council..
- 2.5. The DfE advice covers the following:
 - Definitions of sexual violence, sexual harassment and harmful sexual behaviours.
 - Schools' and colleges' legal responsibilities.
 - A whole school approach to safeguarding and child protection, for example: safeguarding procedures with regard to sexual violence and harassment within the broader approach to safeguarding; the role of education in prevention and specialist support and interventions. How to respond to reports of sexual violence and sexual harassment, covering: immediate response to a report; action following a report; children sharing a classroom and the ongoing response, including working with parents and carers.

3. The Context

- 3.1. The Foundation recognises that all behaviour takes place on a spectrum and understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. In this policy, therefore, we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour (HSB)).
- 3.2. We adopt the NSPCC definition of HSB as: "developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive".
- 3.3. The Foundation will make reference to Simon Hackett's continuum model (see Appendix 4) which demonstrates the range of sexual behaviours. The nationally recognised Brook Traffic Light tool, which helps professionals to identify, understand and respond appropriately to sexual behaviours in young people, will be referenced by the DDSLs who have received the appropriate training.

4. Vulnerable groups

- 4.1. The Foundation recognises that all children can be at risk however we acknowledge that some groups are more vulnerable. This can include: experience of abuse within the child's

family; living with domestic abuse; young people in care; children who go missing; children with additional needs (SEN and/or disabilities); children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010.

5. Responding to alleged incidents of sexual violence and harassment

- 5.1. The Foundation will take all reports seriously and will reassure the victim that they will be supported and safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report.
- 5.2. The Foundation recognises that a child may not disclose their experiences or make a direct report. A friend may make a report on the pupil's behalf or a member of staff may overhear a conversation that suggests a child has been harmed. At other times, staff may observe something of concern, including behaviour changes, and intervene and should consider, with a DSL or DDSL, how to open up a conversation.
- 5.3. The Foundation recognises that a child, who does disclose an allegation to staff, is likely to disclose this to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. Consequently all staff receive training on how to manage a report of child-on-child sexual violence and sexual harassment.
- 5.4. In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the Foundation and support from external agencies will be sought, as appropriate. See also the section entitled "Prevention of Peer-on-Peer Abuse" below.

6. Action following a report of sexual violence and/or harassment

- 6.1.1. Following an alleged incident, the DSL or DDSL will consider:
 - The wishes of the victim in terms of how they wish to proceed. This is especially important in the context of sexual violence and sexual harassment.
 - The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of HSB.
 - The ages of the children involved.
 - The developmental stages of the children involved.
 - Any power imbalance between the children, For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
 - Whether the alleged incident is a one-off or sustained pattern of abuse.
 - Whether there are ongoing risks to the victim, other children, adult students or school or college staff; and other related issues and wider context.

- 6.2. For cases of consensual or non consensual sharing of nudes or semi nudes, the DSL will also make reference to [Section 7](#) of this appendix.
- 6.3. In accordance with the DfE advice, ultimately any decisions are for the Foundation to make on a case-by-case basis, with the DSL (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.
- 6.4. Adults and professionals may contact the dedicated NSPCC helpline, for support and guidance, in relation to children and young people who have experienced abuse at school. This helpline is also for children and young people affected.
- 6.5. When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
- the victim, especially their protection and support;
 - the alleged perpetrator; and
 - all other children (and, if appropriate, adult students and staff) at the Foundation, especially any actions that are appropriate to protect them.
- 6.6. Risk assessments will be recorded, shared with staff as appropriate and kept under review. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.
- 6.7. A pupil against whom an allegation of abuse has been made may be suspended from the Foundation during the investigation. The Foundation will take advice from the relevant SCB (see 'external agency contact information' earlier in this Policy) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the Foundation will ensure that, subject to the advice of the SCB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the Foundation and advice will be sought as necessary from the SCB or police as appropriate. Allegations of peer on peer abuse will be recorded in MyConcern in the same way as other safeguarding concerns.
- 6.8. Where the report includes an online element, the Foundation's Searching, and Retention and Disposal of Confiscated Items Policy will be followed.

7. Sharing of nudes and semi-nudes ('sexting' or 'youth produced sexual imagery')

7.1. This guidance has been written with reference to the non-statutory advice [sharing nudes and semi nudes: for education settings working with children and young people](#), published by the UK Council for Internet Safety. The full guidance, alongside the full Safeguarding and Child Protection Policy, KCSIE 2021, the DfE Sexual Violence and sexual harassment between children in schools and colleges, the Foundation's Searching and Retention and Disposal of Confiscated Items Policy and the local procedures should be referred to when dealing with an alleged incident.

7.2. **Definitions:** This advice uses the term 'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents.

7.3. Staff who become aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos must report it to the DSL or a DDSL immediately and must not:

- View, copy, print, share, store or save the imagery, or ask a pupil to share or download it (if staff have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

7.4. Staff should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

7.5. Review

7.5.1. Following a report of an incident, the DSL will hold an initial review meeting with appropriate members of staff which may include the staff member(s) who reported the incident as well as the DDSL for the relevant Foundation site. This meeting will consider the initial evidence and aim to determine:

- whether there is an immediate risk to pupil(s)
- if a referral needs to be made to the police and/or children's social care
- if it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- what further information is required to decide on the best response
- whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the pupils involved which would influence risk assessment
- if there is a need to contact another school, college, setting or individual
- whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

7.5.2. The DSL will make an immediate referral to police and/or children's social care if:

- the incident involves an adult
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- what the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- the imagery involves sexual acts and any pupil in the images or videos is under 13
- the DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

7.5.3. If none of the above apply then the DSL, in consultation with the DDSL and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. If further information/concerns are disclosed at a later date, the incident may be subsequently escalated.

7.5.4. All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 17 of this policy also apply to recording these incidents.

APPENDIX 4 - Simon Hackett's continuum model

Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism

<https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework>

APPENDIX 5

1. USE OF CAMERAS/IPADS/VIDEOS CAMERAS AND MOBILE PHONES

1.1. Photographs and videos

- 1.1.1. Parents/carers have given permission for their children's photographs to be taken when they join the Foundation under the terms and conditions. Staff will be made aware where permission has not been given.
- 1.1.2. Photos or videos of children should only be taken using Foundation designated devices. Storage of the images should be on Foundation storage only, on Foundation computers or other Foundation devices and on secure Foundation accounts on social media.
- 1.1.3. Before taking a photograph it is good practice to explain to the children why you want to take it and check that they are happy for this to happen.
- 1.1.4. Children in photos on display in any forum (including media and social media) should not be named by their full name.

1.2. Use of Personal Mobile Devices including cameras

- 1.2.1. All staff must silence their mobile devices when in the classroom. Personal mobile devices, including cameras, are not permitted by staff in the Early Years Foundation Stage (EYFS) setting.
- 1.2.2. All members of staff may use their mobile devices during their break times and when there are no children in the room.
- 1.2.3. If for personal reasons mobile devices need to be kept on and not silent, members of staff must discuss this with the Head of School and devices must be stored outside of the classroom.
- 1.2.4. Visitors on tours must be supervised by a member of staff. Photographs may be taken by visitors as long as no children are present and photographs must not be of child images on display.
- 1.2.5. Visitors or volunteers working alongside staff and children must turn off their mobile devices and store them outside the classroom in a lockable cupboard.

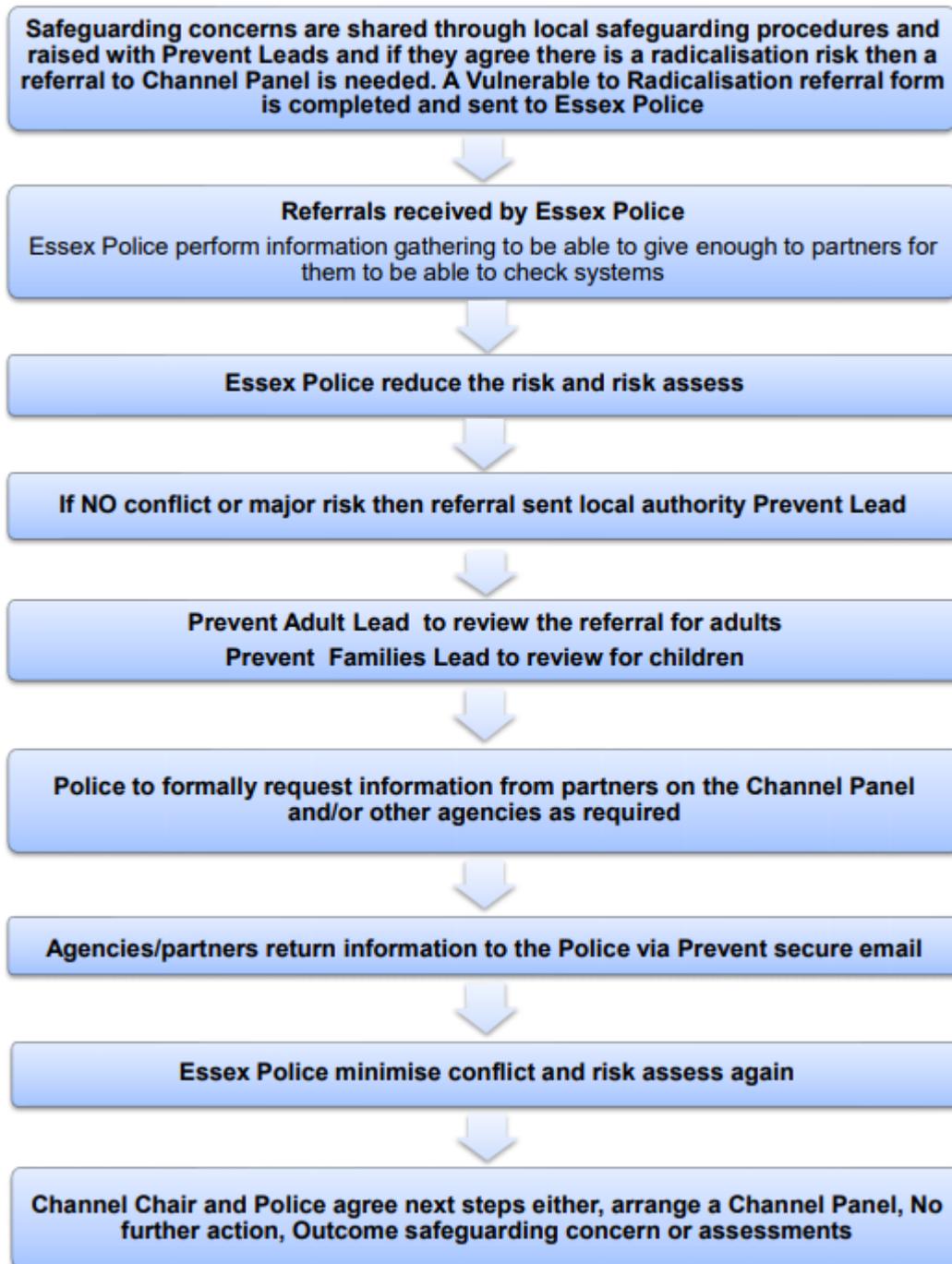
1.3. Child Protection and Taking of Images by Family and Friends

- 1.3.1. All adults will be mindful of child protection and safeguarding issues and should refer to the Foundation's Taking of Images by Family and Friends Policy which is published on the

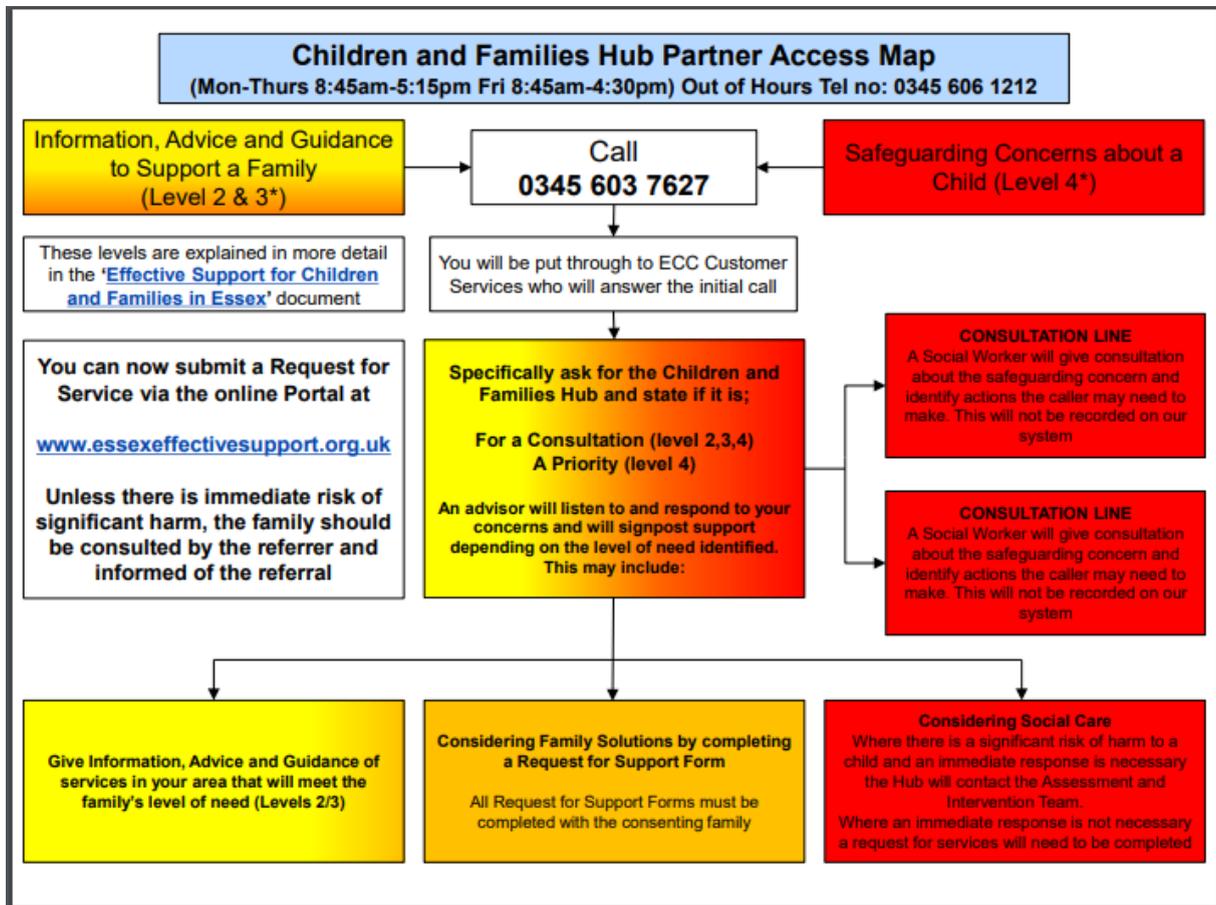
Foundation's website.

- 1.3.2. When publishing images of children in documents or on the website/for Twitter use, care shall be taken to minimise the risk of such images being modified to create inappropriate or indecent images. The DSL can give specific advice as requested.
- 1.3.3. All adults must raise concerns with the DSL or DDSLs if they become aware of anyone:
 - Taking an unusually large number of images;
 - Taking images in inappropriate settings such as cloakrooms, toilets or changing areas;
 - Taking images of students who are apparently unaware that they are being photographed or filmed in situations where taking images would not be expected.
- 1.3.4. Using photographic material of any kind to bully, harass or intimidate others will not be tolerated and will constitute a serious breach of discipline which may lead to dismissal. Appropriate action will be taken in accordance with the Foundation's anti-bullying and behaviour, rewards and sanctions policies.

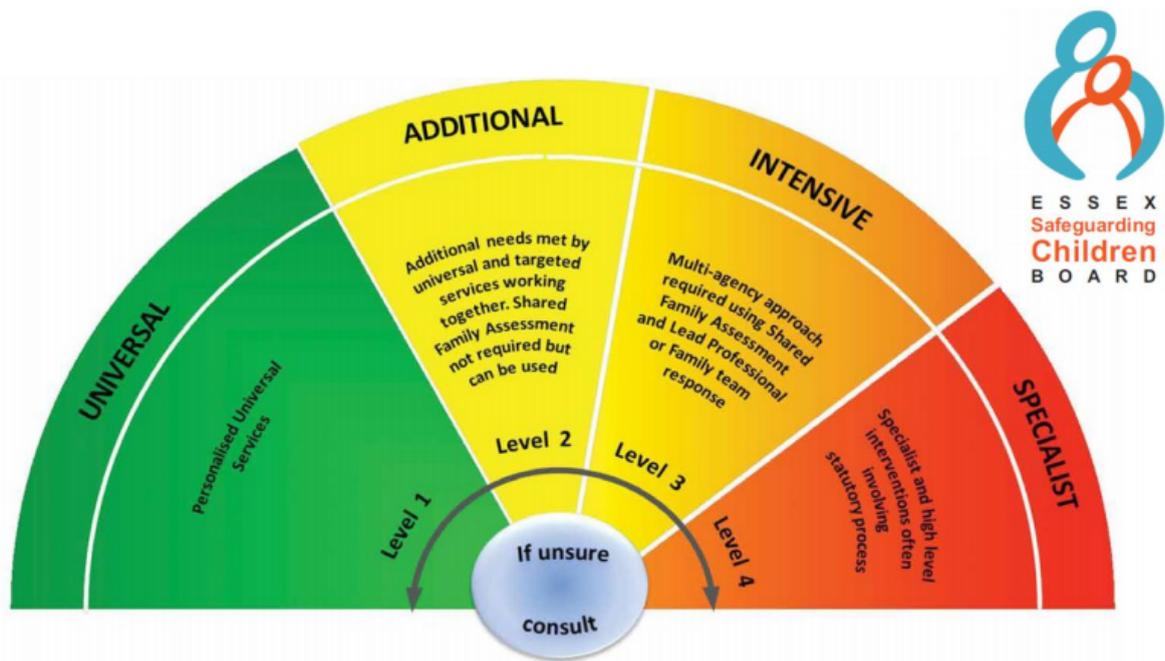
APPENDIX 6: ESCB PREVENT Referral Flowchart (Page 12, ESCB PREVENT Policy and Guidance)



APPENDIX 7: Essex Children and Families Hub flow chart



APPENDIX 8: The Essex Effective Support Windscreen (page 8, Effective Support for Children and Families in Essex 2017)

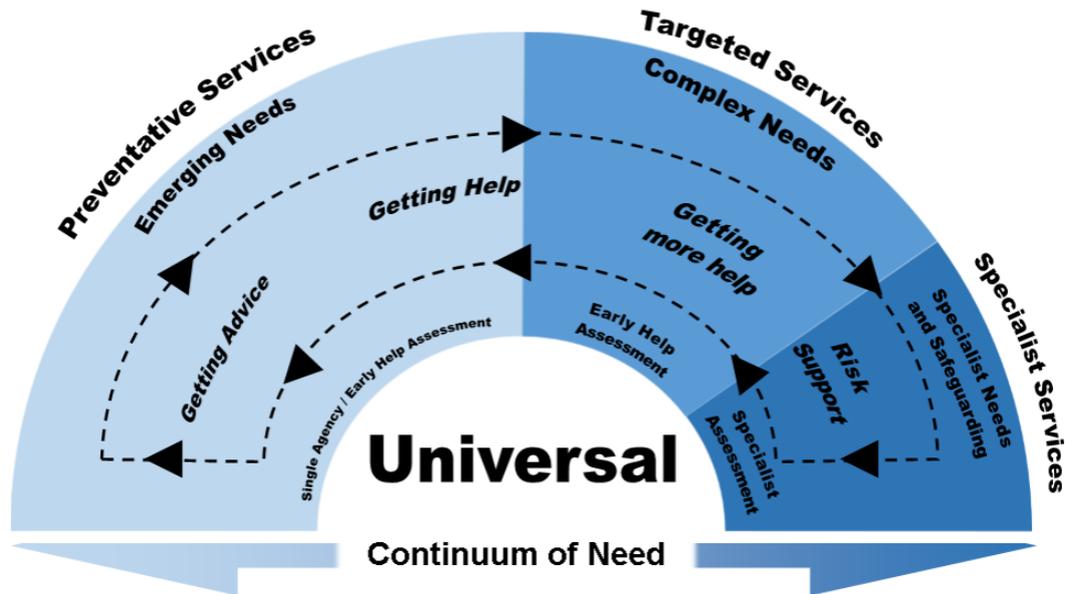


1. All partners working with children, young people and their families will offer support as soon as we are aware of any additional needs. We will always seek to work together to provide support to children, young people and their families at the lowest level possible in accordance with their needs.
2. Children with **Additional** needs are best supported by those who already work with them, such as Family Hubs or schools, organising additional support with local partners as needed. When an agency is supporting these children, an Early Help Plan and a Lead Professional are helpful to share information and co-ordinate work alongside the child and family.
3. For children whose needs are **Intensive**, a coordinated multi-disciplinary approach is usually best, involving either an Early Help Plan or a Shared Family Assessment (SFA), with a Lead Professional to work closely with the child and family to ensure they receive all the support they require. Examples of intensive services are children’s mental health services and Family Solutions.
4. **Specialist** services are where the needs of the child are so great that statutory and/or specialist intervention is required to keep them safe or to ensure their continued development. Examples of specialist services are Children’s Social Care or Youth Offending Service. By working together effectively with children that have additional needs and by providing coordinated multi-disciplinary/agency support and services for those with intensive needs, we seek to prevent more children and young people requiring statutory interventions and reactive specialist services.

APPENDIX 9: Peterborough and Cambridgeshire - Continuum of Need (Windscreen)

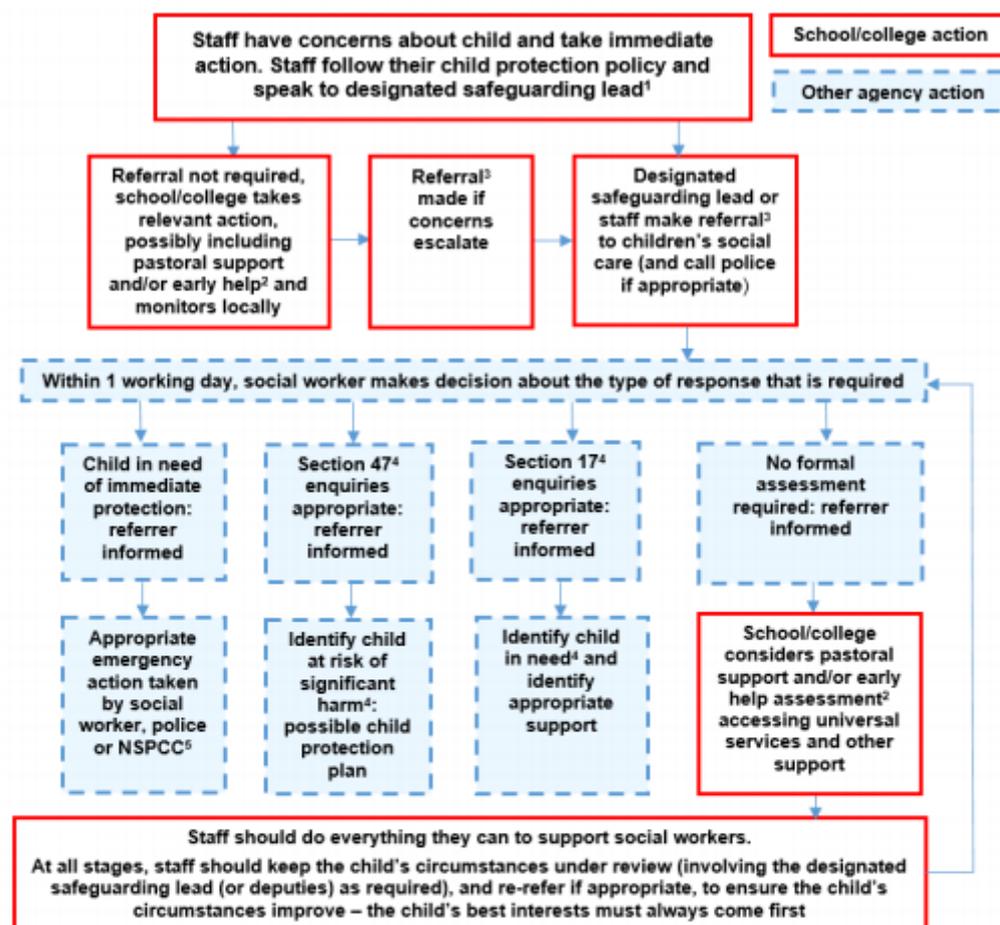
Effective Support for Children and Families in Peterborough and Cambridgeshire

Peterborough and Cambridgeshire –Continuum of Need (Windscreen)



APPENDIX 10 - Actions where there are concerns about a child (KCSIE 2021)

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).