Stephen Perse

Foundation

SAFEGUARDING AND CHILD PROTECTION POLICY

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1. INTRODUCTION

1.1. This policy is applicable to the Stephen Perse Foundation (the **School**). 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 School'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 Stephen Perse 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 School 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 students at the School is our highest priority. We strive to know everyone as an individual and to provide a secure and caring environment so that every student can learn in safety. We operate with the best interests of the child at heart.

3.2. The School adopts a 'whole school' approach to safeguarding, which means involving everyone in the School and ensuring that safeguarding and child protection are at the forefront of and underpin all relevant aspects of process and policy development.

3.3. In all matters relating to child protection the School will follow the procedures laid down by the relevant Safeguarding Partnership Board (which is the Cambridgeshire and Peterborough Safeguarding Children Partnership Board (CPSCPB) for all Stephen Perse Foundation schools apart from Dame Bradbury's where the Essex Safeguarding Children Board procedures apply or, where appropriate, the relevant Safeguarding Partnership Board for a child together with Department of Education guidance contained in Working Together to Safeguard Children (December 2023) and Keeping Children Safe in Education 2025 (KCSIE 2025). In Essex, all professionals must work in accordance with the Southend, Essex and Thurrock (**SET**) Procedures (Essex Safeguarding Children Board (**ESCB**)).

3.4. This policy has regard to the following legislation and guidance:

- Keeping Children Safe in Education (September 2025)
- Working Together to Safeguard Children 2023 (updated June 2025)
- Working together to improve school attendance (May 2022, updated August 2024)
- Guidance for safer working practice for those working with children and young people in education settings (February 2022)
- Education Act 2002 (as amended)
- Disqualification under the Childcare Act 2006 (statutory guidance, August 2018)
- The National Minimum Standards for Boarding Schools (NMS) (September 2022)
- Statutory framework for the Early Years Foundation Stage (March 2014, updated July 2025)
- Prevent Duty Guidance for England and Wales (updated March 2024);
- The Prevent duty: safeguarding learners vulnerable to radicalisation (DfE, updated September 2023)
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (updated 2023);
- The use of social media for online radicalisation (July 2015)

- Prevent Radicalisation and Extremism by Acting Early
- Multi-agency statutory guidance on FGM (April 2016, updated July 2020):
- Multi-agency practice guidelines: Handling cases of forced marriage (June 2014, updated April 2023)
- 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 (March 2015, updated May 2024)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (DCMS and UKCIS, December 2020, updated March 2024)
- Southend, Essex and Thurrock (SET) Safeguarding and Child Protection Procedures (ESCB June 2025)
- Cambridgeshire Threshold Document: Continuum of Help and Support (CPSPB December 2024)
- Effective Support for Children and Families in Essex (ESCB October 2024)
- Preventing youth violence and gang involvement - Practical advice for schools and colleges (August 2013)
- Criminal exploitation of children and vulnerable adults: county lines (July 2017, updated October 2023)
- Counter Terrorism and Security Act 2015
- Serious Crime Act 2015
- Sexual Offences Act 2003 (s. 46 Police, Crime, Sentencing and Court Act 2022)
- The School Attendance (Pupil Registration) (England) Regulations 2024
- Data Protection Act 2018
- Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance (March 2022, updated March 2025)
- Searching, screening and confiscation guidance for practitioners (2014, updated July 2023)
- Children Act 1989
- Children Act 2004
- Preventing and Tackling Bullying guidance (2017)
- Female Genital Mutilation Act 2003 (s. 74 Serious Crime Act 2015)
- Multi-agency statutory guidance on FGM, April 2016 (updated July 2020)
- Multi-agency practice guidelines: Handling cases of forced marriage, 2014 (updated April 2023)
- 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)
- Equality Act 2010
- Equality Act 2010: advice for schools (updated June 2018)
- Reducing the need for restraint and restrictive intervention (HM Government guidance, June 2019)
- After-school clubs, community activities and tuition: safeguarding guidance for providers (updated May 2025)
- The Charity Commission guidance Safeguarding and protecting people for charities and trustees (December 2017, updated June 2022)
- When to Call the Police: Guidance for Schools and Colleges (National Police Chiefs' Council)

3.5. There are four main elements to our policy:

3.5.1. **Prevention** through the teaching and pastoral support offered to students and the creation and maintenance of a protective ethos across the School.

3.5.2. **Procedures** for identifying and reporting cases, or suspected cases, of abuse. The definitions of the four categories of abuse are in Annex 1.

3.5.3. **Supporting children**, particularly those who may have been abused or witnessed violence towards others.

3.5.4. **Preventing unsuitable people working with children,** processes are followed to ensure that those who are unsuitable to work with children are not employed.

PART 1

4. PREVENTION

4.1. We recognise that the School plays a significant part in the prevention of harm to our students 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 students and recognise the role the School plays in recognising and protecting our students who may be vulnerable to radicalisation or exposed to extremist views.

4.2. The School is committed to safeguarding and promoting the welfare of each student in its care and will:

- establish and maintain an ongoing stable relationship of trust and respect in an environment where students feel safe, understood and supported, 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 Personal Social Health and Economic Education (PSHEE), Relationships Education, Relationships and Sex Education (RSE) and Health Education which will cover relevant topics in an age and stage appropriate way and will have regard to the DfE's current statutory guidance. During the course of the year, the School will be planning for the delivery of the content from the DfE's 2025 statutory guidance from September 2026;
- tailor the education it provides to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities;
- create a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment as the School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain;
- practise safe recruitment by checking the suitability of staff, Governors and volunteers to work with children and young people. See the School'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 professional 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 students on the School sites, the School 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 (CPSCPB) and the Essex Safeguarding Children Board (ESCB);
- make arrangements (one-to-one tutorials, PSHEE, tutor time, school counsellors) to ensure that students' wishes and feelings are sought, heard and responded to, provide early help to children and take their concerns seriously;
- be alert to signs of abuse or possible abuse, both in the School and outside, and strive to protect each student 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 students, many of whom will be in the UK without their parents, and ensure that an Education Guardian is appointed in accordance with the School'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 students with medical conditions;
- operate appropriate health & safety procedures;
- ensure that the School 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 School or in the local area which may be specific to individual students including e-safety, mental and emotional wellbeing and safer cycling;
- ensure that any weaknesses or deficiencies in the School's child protection arrangements are remedied without delay;
- give specific attention to safeguarding arrangements where students are engaged in close one-to-one teaching (performing arts, sports, music). Such arrangements are detailed in the Staff Code of Conduct ;
- ensure appropriate safeguards are in place to provide distinct areas in boarding for children and those 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.

PART 2

5. PROCEDURES

5.1. Every member of staff and Governor of the School, as well as every volunteer who assists the School, has a duty to safeguard our students' welfare and must therefore familiarise themselves and comply at all times with this policy; safeguarding and promoting the welfare of students 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. <u>All staff, volunteers and Governors must read and understand at least Part 1 and/or Annex A as well as Annex B of KCSIE 2025.</u> All School leaders and School staff who work directly with students should read and understand the entirety of KCSIE 2025.

5.3. All School 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 Annex 9. 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 2025.

5.4. This policy has been authorised by the Governors and is available to parents on request, and is published on the School website. It applies wherever staff or volunteers are working with students, even where this is away from the School sites and applies to all students, with appropriate adaptations for those who are aged 18 or above. This policy must also be followed when responding to safeguarding concerns about other organisations and individuals using any of the School's sites for the purposes of running activities for children.

5.5. Safeguarding and promoting the welfare of children is defined in KCSIE 2025 as:

a. Providing help and support to meet the needs of children as soon as problems emerge;
b. Protecting children from maltreatment, whether that is within or outside the home, including online;
c. Preventing the impairment of children's mental and physical health or development;
d. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
e. Taking action to enable all children to have the best outcomes.

5.6. Child protection is part of safeguarding and promoting the welfare of children is defined as "activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online."[1]

5.7. Every student should feel safe and protected from any form of abuse, neglect and exploitation. Please see Annex 1 for explanations of the types of abuse and possible signs of abuse. Some students may be in need of additional support even though they may not be deemed at risk of harm – such students are classed as 'children in need'. The School takes students' mental and emotional wellbeing seriously. All concerns outside child protection are dealt with through the pastoral system and should be raised with the student'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 two of its members to take leadership responsibility in the School's safeguarding arrangements. Dr Nathaniel Segaren, Mr Jonathan Onions and Mr Marwan Mikdadi are the nominated liaison Governors for safeguarding issues. There is a written role specification for the designated safeguarding Governors.

6.2. The role of the nominated Governors 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 Governors, in conjunction with the Designated Safeguarding Lead (DSL), carry out an annual review of the School'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.

[1] Working Together to Safeguard Children 2023, page 8

6.3. The Governing Body is responsible for:

- strategic leadership of the School's safeguarding arrangements and ensuring that the School 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 School's Operational and Educational Executive is appointed to the role of DSL;
- ensuring that the DSL has appropriate status and authority within the School 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 is always available (including out of school hours and during holidays) to discuss any safeguarding concerns and that all staff are clear on who to contact;
- ensuring that the role of DSL and DDSL and responsibilities for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) 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 School's safeguarding arrangements take into account the procedures and practice of the CPSCPB and ESCB, including understanding and reflecting local protocols for assessment and the referral threshold document;
- ensuring that the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of students are identified and support to children subject to child protection plans;
- awareness of the additional risk of harm that students with special educational needs and disabilities (SEND) may be vulnerable to; and
- reviewing its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep children safe.

6.4. This policy is likely to be subject to ongoing amendments due to changes to legislation. The School 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 Operational and Educational Executive (OpEd Executive), the DSL and the nominated Governors for safeguarding.

7. KEY SCHOOL CONTACTS

The Nominated Safeguarding Governors Dr Nathaniel Segaren, Mr Jonathan Onions and Mr Marwan Mikdadi, can be contacted via the Clerk to the Governors on 01223 454 708.

OUT OF HOURS: 01223 454 765
E-mail: safeguarding@stephenperse.com

Designated Safeguarding Lead (DSL) with ultimate responsibility			
Richard Girvan	principal@stephenperse.com	Tel: 01223 454700	Tel: 07886857006
The DSL can also be contacted via the PA to the Principal: mws:@stephenperse.com Tel: 01223 454700 ext 1124 or Kate Shriever on Tel: 01223 454700 ext 4006			

Boarding, Sixth Form and overall Deputy Designated Safeguarding Lead (DDSL)				
DDSL	Denise Hammersley	dha@stephenperse.com	Tel: 01223 707955	Tel: 07932728510

Executive Deputy Designated Safeguarding Lead				
DDSL	Alice Heywood	ahe@stephenperse.com	Tel: 01223 454700	Tel: 07772 600736

Stephen Perse Early Years Deputy Designated Safeguarding Leads				
DDSL	Sarah Holyoake	seh@stephenperse.com	Tel: 01223 454700	Tel: 07891 247592
DDSL	Verity Brownbridge	vbr@stephenperse.com	Tel: 01799 522348	Tel: 07891 247522

Stephen Perse Cambridge Junior School Deputy Designated Safeguarding Leads				
DDSL	David Hewlett	dhe@stephenperse.com	Tel: 01223 346140	Tel: 07526 176790
DDSL	Ruth Dunmore	rkd@stephenperse.com	Tel: 01223 346140	Tel: 07903 721569

Dame Bradbury's School Deputy Designated Safeguarding Leads				
DDSL	James McCaughran	jom@stephenperse.com	Tel: 01799 522348	Tel: 07928 692539
DDSL	Claire Matthews	cma@stephenperse.com	Tel: 01799 522348	Tel: 07794 539266

Stephen Perse Cambridge Senior School Deputy Designated Safeguarding Leads				
DDSL	Shahzad Rahman	ssr@stephenperse.com	Tel: 01223 454700	Tel: 07984 876458

DDSL	Matthew Styles	mst@stephenperse.com	Tel: 01223 454700	Tel: 07975 518700

Domestic Abuse Lead			
Denise Hammersley	dha@stephenperse.com	Tel: 01223 707955	Tel: 07932 728510
Prevent Lead (1-18)			
Shahzad Rahman	ssr@stephenperse.com	Tel: 01223 454700	Tel: 07984 876458
Child Sexual Exploitation Champion			
Denise Hammersley	dha@stephenperse.com	Tel: 01223 707955	Tel: 07932 728510
"Looked after children" Leads			
David Hewlett (5 - 11 Junior School, Fitzwilliam Building)	dhe@stephenperse.com	Tel: 01223 346140	Tel: 07526 176790
Claire Matthews	cma@stephenperse.com	Tel: 01799 522348	Tel: 07794 539266
Sarah Holyoake (EYFS)	seh@stephenperse.com	Tel: 01223 454700 ext: 5002	Tel: 07891 247592
Lynsey Gogin	lhg@stephenperse.com	Tel: 01223 454700	
Online Safety Lead and Lead for Filtering and Monitoring			
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, NEGLECT OR EXPLOITATION

8.1. All action is taken in accordance with statutory guidance and local guidelines.

8.2. The School treats the safeguarding of the students 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 School staff are made aware of their duty to safeguard and promote the welfare of students in the School's care, the safeguarding arrangements in place, the name of the DSL (and deputies) and how to share concerns with them.

8.3. All staff are made aware that children can be at risk of harm inside and outside of the School, inside and outside of home and online. They are trained to exercise professional curiosity guided by knowledge of what indicators of abuse, neglect and exploitation to look for - see further at Annex 2.

8.4. Staff members are alert to the particular potential vulnerabilities of looked after and previously looked after children. Sarah Holyoake (EYFS), David Hewlett (5-11, Junior School, Cambridge), Claire Matthews (1-11, Dame Bradbury's) and Lynsey Gogin (11-18) are the appropriate staff members for liaising with virtual school heads for those looked after children in the School. 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 student 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 students safe.

9.2. It is the duty of all staff to listen carefully, avoid asking leading questions, observe the individual's behaviour, 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 student) 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 student, 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 student should be told that the matter will be referred on in confidence to the appropriate people in positions of responsibility.

9.3. A student 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 should be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns.

9.5. 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).

9.6. 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 School decides to pass the information onto an outside agency in accordance with this policy, the DSL will contact the disclosing party (unless the School 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.

9.7. If any member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in the School, have any concerns about a student's welfare, they should act on them immediately. Staff should report any concerns (including those where a student may benefit from early help or where it includes alleged abuse by one or more students against another student) to the DSL and submit an accurate written record of the disclosure or concerns. However, any staff member can make a direct referral to local authority 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).

9.8. Where the School receives an allegation relating to an incident that happened when an individual or organisation was using School premises for the purposes of running activities for children, this policy and the procedures set out in it will be followed, including informing the LADO.

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 local authority 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 local authority 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 local authority 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 appropriate contact leads on the Cambridgeshire Partnership Board website/Essex Safeguarding Team for advice; Early Years' DDSLs will contact the Early Years' safeguarding Advisors directly 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 City Council, 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 (Annex 6) and in accordance with the procedures outlined in the SET Safeguarding and Child Protection Procedures (ESCB, 2025) and in "Effective Support for Children and Families in Essex" (ESCB, 2024). 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.

10.6. For children who live in other counties, the DSL or DDSL will immediately refer cases of suspected abuse or allegations to Cambridgeshire Children's Services (Cambridgeshire

based schools) or Essex Children and Families Hub (Dame Bradbury's) and follow the instructions provided, which may include requiring the School to make a referral to the Local Authority of the county in which the child primarily resides.

11. CHILDREN IN NEED / EARLY HELP ASSESSMENT

11.1. The School 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 is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

11.2. 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 (EHC) plan);
- has a mental care 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 education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and/or other drugs themselves;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child.

11.3. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as local authority 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 School will liaise and take advice from external agencies as appropriate.

11.4. Children who are in need of additional support will be discussed with Children's Social Care Services without identifying individuals in the first instance and following discussions, Children's Social Care will judge whether or not an allegation or concern meets the relevant threshold in the Cambridgeshire or Peterborough Threshold Document: Continuum of Help and Support (December 2024) or Effective Support for Children and Families in Essex (2024) 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.

11.5. 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 local authority children's social care again.

11.6. 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 School will follow this up with the local authority 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.

11.7. The School 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.

11.8. With regard to the Prevent Duty, the School will co-operate with Channel panels and the Police when assessments are being undertaken. School staff understand how to identify those who might benefit from Channel support and how to make a referral and also understand that an individual will be required to provide their consent before any support delivered through the programme is provided. A flowchart setting out the referral process for Essex is at Annex 6.

11.9. In the case of child-on-child abuse which the School has reported to Children's Social Care and which statutory child protection authority decides not to investigate further, the matter will be dealt with under the School's Anti-Bullying, Child-on-Child Abuse and Behaviour, Rewards and Sanctions policies, and any other relevant policies, after discussion with the LADO.

11.10. Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a student, 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 local authority children's social care or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with local authority children's social care or the police what information can be disclosed.

11.11. For children in need of additional support from one or more agencies, the School will make contact with the relevant external agency and will arrange for any necessary meetings to occur and for in school support. The School's local authority is Cambridgeshire for all schools within the School 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 School's points of contact for children who are the focus of concern are as follows:

The telephone numbers for Local Authority 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 Children and Families Hub (Social Care)	Tel: 0345 603 7627
Essex Children and Families Hub (out of hours)	Tel: 0345 606 1212

Cambridgeshire (all schools apart from Dame Bradbury's)

Cambridgeshire & Peterborough Safeguarding Partnership Board website	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://lcs-childrens-portal.peterborough.gov.uk/web/portal/pages/professional
Cambridgeshire Local Area Designated Officer (LADO or DO)	Tel: 01223 727 967 Tel: 01733 234 724 (out of hours) LADO@cambridgshire.gov.uk
Education Safeguarding Team (support and guidance on safeguarding and child protection issues)	ECPS.General@cambridgeshire.gov.uk
Cambridgeshire Police Child Abuse Investigation Unit - non-emergency number	Tel: 101
Early Help Hub (EHH)	Tel: 01480 376 666 (office hours) Email: early.helphub@cambridgeshire.gov.uk
Multi-Agency Safeguarding Hub (**MASH**) - referrals and professional consultation	Tel: 0345 045 5203 MASH.C&F@cambridgeshire.gcsx.gov.uk
All Enquiries - Contact Centre	0345 045 5203

Essex (Dame Bradbury's)

Essex Safeguarding Children Board website	www.escb.co.uk
Essex Local Area Designated Officer (LADO or DO)	Tel: 03330 139 797 Email: lado@essex.gov.uk
Police Emergency	999
Police Non-emergency	101

Ofsted - contact about concerns	Tel: 0300 123 4666 (Mon-Fri, 8am-6pm)
	cie@ofsted.gov.uk
Extremism - Department for Education dedicated helpline for staff and governors	Tel: 020 7340 7264 Email: counter.extremism@education.gov.uk Online reporting: https://report-extremism.education.gov.uk/

Other useful contacts

Disclosure and Barring Service helpline	Tel: 03000 200 190 Email: customerservices@dbs.gov.uk
Teaching Regulation Agency (teacher misconduct)	Tel: 020 7593 5393 Email: TRA.Casework@education.gov.uk
Forced Marriage Unit	Tel: 020 7008 0151
NSPCC helpline	Tel: 0808 800 5000 Email: help@NSPCC.org.uk
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 2025. They are typically members of one of the Senior Leadership Teams or deputy head teachers at the School.

13.2. The DSL and DDSLs' training meets the requirements as set out in Annex C of KCSIE 2025.

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 and understanding the filtering and monitoring systems and processes in place.

13.4. The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School, including in relation to online safety and understanding the filtering and monitoring systems and processes in place. 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 student 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 relevant Head of School, as appropriate, to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations, and including awareness of the requirement for children to have an Appropriate Adult;
- 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 Nurse/Matron/Health and Wellbeing Practitioner, IT Technicians, and SENCOs, 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 School's child protection policies are known, understood and followed appropriately;
- ensure the School's Safeguarding and 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 School's Safeguarding and Child Protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the nursery, individual 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 students, including children with a social worker, are experiencing, or have experienced, with teachers and School leadership staff. Their role could include ensuring that the School, and its staff, know who these students 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 students in this group might face and the additional academic support and adjustments that they could make to best support these students.

13.5. The DSL and/or the DDSLs can be contacted at any time (during and outside of school hours) for staff in the School to raise or discuss any safeguarding concerns. In the first instance, contact should be made with the DSL or DDSL for the School nursery, school, Sixth Form or boarding house where the student 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 School 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 local authority 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 School 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 premises where students have potentially committed a crime, and what to expect when they do.

14. CHILD'S WISHES

14.1. The School will take a child-centred approach to safeguarding and promoting the welfare of its students, working in partnership with parents and carers as far as possible. Where there is a safeguarding concern the School will ensure the student'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 School will operate processes and take actions and decisions which will be led by what is considered to be in the best interests of the student.

15. PARENTS

15.1. We understand the importance of working collaboratively with parents and carers in the interests of their child. Parents and carers need to understand what is happening, what they can expect from the help and support provided, what is expected of them and be supported to say what they think. This is particularly important when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, whether the harm is from inside or outside the home including online. Working collaboratively will mean parents and carers have the best chance of making changes, and the School can make fair and accurate decisions about how to support children and keep them safe. While collaborative relationships between practitioners and parents and carers are important, the wishes and feelings of the child and what is in their best interest remain central to decision-making.

15.2. When we work with parents and carers we strive to:

15.2.1. build strong, positive, trusting and co-operative relationships;
15.2.2. use respectful, non-blaming clear and inclusive verbal and non-verbal communication;
15.2.3. empower parents and carers to participate in decision-making; and
15.2.4. involve parents, carers and families in designing processes that affect them and seeking feedback from them.

15.3. In general, we believe that parents should be informed about any safeguarding concerns regarding their children and be engaged with our response and support. 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 DDSL 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.

15.4. The School 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. Parents/guardians/carers have an important role in supporting the School. 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 School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy.

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

17. RECORD KEEPING

17.1. Well-kept records are essential to good child protection practice. The School is clear about the need to record in writing all concerns, discussions and decisions made, and the reasons for those decisions about a student or students within the School, the status of such records and when these records should be shared with other agencies. This will also help if/when responding to any complaints about the way a case has been handled by the School. Records will be clear, detailed and accurate and will include:

- a clear and comprehensive summary of the concern;
- the child's wishes and feelings;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome;
- a record of any discussion/communication with parents, other agencies etc

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

17.2. The School records all safeguarding and child protection concerns electronically on MyConcern, a purpose-made, secure platform used for recording and managing safeguarding concerns. In addition, appropriate secure storage arrangements are in place for any historic hardcopy safeguarding files. 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 2023)".

17.3. A separate child protection file, where applicable, is created for each student and MyConcern enables the School to view all concerns and referrals relating to each student, even if one or more of those concerns relates to or involves other students.

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.

17.5. When a child about whom there have been child welfare concerns (whether subject to a child protection plan or not) leaves the School or transfers to another setting, the DSL should ensure that the student's safeguarding file will be transferred, separately from the main student 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 safeguarding file and, once sent, ask them to confirm as soon as possible that they have received the file. The relevant 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. In addition to the safeguarding 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 student leaving.

17.5.5. For hardcopy files, the School will not keep a copy of transferred records but will keep a record of the current file location and date the file was transferred. Electronic files are archived after transfer.

17.6. In the event that a new student with a safeguarding file joins the School, the DSL will ensure that key staff such as DDSLs and members of the special educational needs team are aware as required.

17.7. All actions and decisions will be led by what is considered to be in the best interests of the student 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 student, 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 and UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully, they are 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 School 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 School works within the guidelines set out in the DfE Information Sharing Advice for Safeguarding Practitioners.

18.5. The DSL or DDSL may disclose any information about a student 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. If in any doubt about sharing information, staff should speak to the DSL or a DDSL.

18.7. The School will notify the relevant local authority children's Social Care Team immediately if:

18.7.1. it should have to suspend or exclude a student who is subject to a Child Protection Plan (whether fixed term or permanently);

18.7.2. there is an unexplained absence of a student who is subject to a Child Protection Plan;

18.7.3. there is any change in circumstances to a student who is subject to a Child Protection Plan.

18.8. If a student 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 student 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 students).

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 student 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 student. Parental consent is not required for referrals to statutory agencies such as the police and local authority 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 School 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.

18.12. When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The School will also have regard to its data protection policies. The School's Data Compliance Officer (the Chief Compliance Officer) will work with the DSL as appropriate to determine what should be disclosed.

19. USE OF MOBILE DEVICES INCLUDING CAMERAS AND OTHER SMART DEVICES

19.1. Neither staff nor students may use their own personal cameras or mobile phones to take photographs within the School. Please see the School's policy on taking photographs and videos of students on School devices at Annex 4.

20. ONLINE SAFETY INCLUDING FILTERING AND MONITORING

20.1. Staff are all made aware that technology is a significant component in many safeguarding wellbeing issues. Children are at risk of abuse and other risks online as well as face to face and that these may take place concurrently via online channels and in daily life.

20.2. The School will ensure that:

20.2.1. appropriate filters and monitoring systems are in place to keep students safe online, which take into consideration the numbers and age range of our students, those who are potentially at greater risk of harm and how often they access the IT system and which are reviewed at least annually and after any law or technology change. This applies offsite as well for all years apart from the Sixth Form (available for Sixth Form upon parental request). These systems reduce the risk of students being exposed to harmful content in line with KCSIE 2025 guidance and the DfE filtering and monitoring standards. Monitoring systems provide real time alerts and weekly reports to designated safeguarding persons so they can proactively identify any causes of concern;

20.2.2. the leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively and know how to escalate concerns when identified;

20.2.3. students are taught about safeguarding, including in relation to online safety;

20.2.4. staff receive online safety training, and regular updates, as a part of the safeguarding training and updates;

20.2.5. online safety is a running and interrelated theme in devising and implementing the School's whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any staff training, the roles and responsibilities of the DSL and DDSLs and in parental engagement; and

20.2.6. liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

20.3. The School carries out an annual review of its approach to online safety, in the context of safeguarding and its compliance with KCSIE 2025, and this is available to staff for their awareness and implementation, where applicable.

20.4. The School's Technology Acceptable Use policies for staff and students and the Online Safety Policy also set out the School's approach in relation to online safety and are reviewed annually.

PART 3

21. SUPPORTING CHILDREN

21.1. The School recognises that **any** child or vulnerable adult may be subject to abuse, neglect and exploitation and as such will support all our students. The School 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" or "risks outside the home").

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, unexplainably and/or persistently missing education, serious violence (including that linked to county lines), radicalisation, gender based violence and and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

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 Annex 1 for types of abuse and neglect.

22.2. Annex B of KCSIE 2025 identifies the following specific forms of abuse, exploitation and safeguarding issues:

- child abduction and community safety incidents
- Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and county lines
- children and the court system
- children who are absent from education
- children with family members in prison
- cybercrime
- domestic abuse
- homelessness
- mental health
- modern slavery
- radicalisation
- the Prevent duty
- sexual violence and sexual harassment between children in schools and colleges
- serious violence
- so-called 'honour-based' abuse including Female Genital Mutilation (FGM) and Forced Marriage
- additional support for the Prevent duty
- child-on-child abuse

23. CHILDREN WHO MAY BE SUSCEPTIBLE TO RADICALISATION INTO TERRORISM AND THE PREVENT DUTY

23.1. We recognise that it is a key role of the School to support children and that the School may provide stability in the lives of children who may be at risk of harm. We also recognise that our students can be susceptible and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination. The School has regard to the Government's statutory guidance, "Prevent duty guidance: Guidance for specified authorities in England and Wales" (HM Government, December 2023).

23.2. "Radicalisation is the process of a person legitimising support for, or use of, terrorist violence."[2] KCSIE 2025 defines 'extremism' as "the *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. This also includes calling for the death of members of the armed forces*".

23.3. Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to changes in students' behaviour which may indicate they are at risk of radicalisation and may need help or protection. However, the School acknowledges that there is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism 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 Prevent Radicalisation and Extremism by Acting Early website which provides practical help and guidance to identify signs of radicalism.

23.4. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately having considered the level of risk. In the first instance, if a member of staff has concerns that a student 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 local authority Children's Social Care. The School, in recognition that students 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

[2] Page 157 KCSIE 2025, as defined in the Government's Prevent Duty Guidance for England and Wales

area. Such risk assessments are discussed with the DSL and DDSLs and Governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

23.5. The School seeks to address its Prevent duty through risk assessment, working in partnership with local partners and other agencies, staff training and IT policies. The School ensures that students' exposure to potential risks while using the internet is limited by having in place age appropriate filtering and monitoring systems (see paragraph 20 above).

23.6. 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.

23.7. The Prevent Lead for the School is Shahzad Rahman.

23.8. **Additional guidance - Prevent duty:** The DfE has issued further guidance: "The Prevent duty: an introduction for those with safeguarding responsibilities", "Understanding and identifying radicalisation risk in your education setting" and "Managing risk of radicalisation in your education setting" (both updated September 2023) which are intended to explain the Prevent referral process and the statutory responsibilities to keep children and young people safe from the risk of extremist ideology or radicalisation and to prepare DSLs/DDSLs to respond effectively and get support for those who may be being exploited by radicalising influences.

24. CHILDREN PERSISTENTLY ABSENT OR MISSING FROM EDUCATION

24.1. A child being absent from education for prolonged periods and/or on repeat occasions, is a potential indicator and can act as a vital warning sign, of a range of safeguarding issues including abuse, neglect, risk of radicalisation, child sexual exploitation and child criminal exploitation - particularly county lines, modern slavery, mental health problems, risk of travelling to conflict zones, a risk of FGM or forced marriage. Unauthorised absences from the School will be managed in accordance with the School's Attendance Policy.

24.2. The School will monitor all student absences and promptly address concerns about patterns of absence with the parent/guardian/carer. Where reasonably possible, the School will hold more than one emergency contact number for each student to provide the School with additional options to make contact with a responsible adult, particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern. A student who fails to attend the School regularly or has been absent from the School without the School'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 School has a duty to report to the local authority, please see the School's Attendance Policy.

25. ELECTIVE HOME EDUCATION

25.1. Where a parent/guardian has expressed their intention to remove a child, of compulsory school age from the School with a view to educating at home, the School 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.

26. CHILDREN MISUSING DRUGS OR ALCOHOL

26.1. The discovery that a student is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to consider a Child in Need or Child Protection referral. However the School will consider such action when there is evidence or reasonable cause:

- To believe the student's substance misuse may cause him or her to be vulnerable to other abuse such as sexual or criminal exploitation;
- To believe the student's substance misuse dependency is affecting their mental and physical health and social wellbeing
- To suspect that the misuse is linked to parent/carer substance misuse;
- To believe that the child's substance misuse dependency is putting the child at such risk that intensive specialist resources are required;
- To perceive the student to be at risk of harm through any substance-associated criminality.

27. CHILDREN LIVING WITH SUBSTANCE MISUSING PARENTS/CARERS

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

27.2. When the School receives information about drug and alcohol abuse by a student's parents/carers they will follow appropriate procedures.

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

- The Parent/ carer/other family member's drug and/or alcohol use is at a problematic level and they are unable to provide care to the student.
- The family home is used for drug taking / dealing / illegal activities.
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance;
- Child or household member found in possession of Class A or Class B drugs / drug paraphernalia found in the home;
- Evidence of substance/drug misuse during pregnancy.

28. CHILDREN LIVING WITH DOMESTIC ABUSE

28.1. 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.

28.2. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

28.3. 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.

28.4. The School 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.

28.5. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child 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).

28.6. Staff will follow the procedures outlined in this policy if concerns of domestic abuse arise. The School 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.

28.7. The School works in partnership with Cambridgeshire Police (and Essex Police for Dame Bradbury's) to identify and provide appropriate support to students 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 abuse incidents, where a student of the School has been present, with the School's DSL and/or the Domestic Abuse Lead.

28.8. On receipt of any information, the DSL/Domestic Abuse Lead will decide on the appropriate support the child may require.

28.9. 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.

29. CHILDREN AT RISK OF CHILD CRIMINAL EXPLOITATION (CCE) AND CHILD SEXUAL EXPLOITATION (CSE)

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

30. CHILD CRIMINAL EXPLOITATION (CCE)

30.1. Criminal exploitation of children is a form of harm 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.

30.2. The School 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.

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

30.4. The School 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.

31. CHILD SEXUAL EXPLOITATION (CSE)

31.1. 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.

31.2. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

31.3. The School recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure an appropriate response to children and young people who go missing, particularly on repeat occasions.

31.4. The DSL or the DDSL, as appropriate, will complete the relevant SCB Contextual Risk Screening Tool and refer to the Multi-Agency Safeguarding Hub (MASH) if there is a concern that a student may be at risk.

32. SERIOUS VIOLENCE

32.1. 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.

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

33.1. 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). School staff will be alert to possible indicators of HBA. Guidance on the warning signs of HBA, and broader guidelines for schools and other educational settings, can be found in the Multi-agency statutory guidance on FGM, April 2016 (updated July 2020) and the Multi-agency practice guidelines: Handling cases of forced marriage, 2014 (updated April 2023).

34. FORCED MARRIAGE

34.1. Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning

disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

34.2. Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found in paragraph 2.11 of the Multi-agency practice guidelines: handling cases of forced marriage (HM Government, updated April 2023).

34.3. Staff should speak to the DSL if they have any concerns. Paragraph 8 of the Multi-agency practice guidelines: handling cases of forced marriage focus on guidelines for schools in detecting and reporting forced marriage.The Forced Marriage Unit can be contacted on 020 7008 0151 or fmu@fcdo.gov.uk for advice and information.

34.4. Since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

35. FGM

35.1. 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).

35.2. All staff should speak to the DSL (or DDSL) with regard to any concerns about FGM.

35.3. 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.

35.4. 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 students.

35.5. 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 students;
- delivering lessons to students;
- assessing the development, progress and attainment of students; and
- reporting on the development, progress and attainment of students.

35.6. 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.

35.7. 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 School 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.

35.8. 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 local authority 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 local authority social care even if it is against the student'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).

35.9. The police child abuse investigation unit telephone number is: 101.

36. MENTAL HEALTH

36.1. All School 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). During the course of the year, the School will be preparing to deliver the content from the 2025 Relationships Education, Relationships and Sex Education (RSE) guidance (to be implemented by September 2026), which enables schools to promote the mental development of students at school, and support them to develop resilience, to know how and when to ask for help, and to know where to access support.

36.2. The School 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, attendance and progress at school. 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.

36.3. Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. Further information can be found in the DfE guidance Mental Health and Behaviour in Schools (updated November 2018) guidance and the School's Mental Health and Relationships and Sex Education policies. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

37. CHILDREN PREVIOUSLY IN CARE OR WHO HAVE RETURNED HOME TO THEIR FAMILY FROM CARE

37.1. The School recognises that a previously looked after child potentially remains vulnerable. The School 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 Cambridgeshire based schools) and the ESCB SET Procedures for Dame Bradbury's.

38. CHILDREN SHOWING SIGNS OF ABUSE AND/OR NEGLECT

38.1. The School 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.

38.2. The School 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 Annex 1).

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

39.1. The School recognises that children with special educational needs, disabilities or certain health conditions can face additional safeguarding challenges, both online and offline, and that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges; and
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

39.2. 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 child-on-child abuse.

39.3. All staff need to be alert to the specific needs of those students who have special educational needs, disabilities, and/or other physical health issues and to the need to avoid the barriers set out above. Staff will support such students with knowing how they can raise concerns and in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse. Staff reporting abuse involving children with SEND will liaise closely with the DSL or DDSL and the SENCO.

39.4. The School recognises that children with disabilities, special educational needs or particular physical health issues may spend more time, and develop unexpected bonds, with a wider range of teaching and non-teaching staff than other students. Children may reveal safeguarding concerns to the member(s) of staff with whom they feel most comfortable. All School staff will be alert to the possibility of children disclosing safeguarding concerns to them, and the School will accordingly ensure that all staff, including non-teaching staff, are familiar with the procedures for dealing with safeguarding concerns. Without causing any unnecessary delay to a child who may be at immediate risk of harm, all staff will reinforce the message that all staff are available to provide support and that a child can share their concerns with whomever they feel most comfortable. The School's environment ensures that all children have access to a range of adults with whom they can communicate.

40. YOUNG CARERS

40.1. The School 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 with an illness or disability, mental health condition or an addiction can increase their vulnerability and that they may need additional support and protection.

40.2. The School 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.

41. PRIVATELY FOSTERED CHILDREN

41.1. 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.

41.2. The School will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer by email to ReferralCentre@cambridgeshire.gov.uk (all schools other than Dame Bradbury's) or to the Private Fostering Team at Essex County Council via the Children and Families Hub (Dame Bradbury's only).

42. CHILDREN WHO HAVE FAMILY MEMBERS IN PRISON

42.1. The School 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.

42.2. The School 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.

42.3. The School will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

42.4. The School will work with the family and the child or young person to minimise the risk of the child not achieving their full potential.

43. CHILD-ON-CHILD ABUSE INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

43.1. The School recognises that children can abuse other children. Child-on-child abuse can manifest itself in many ways and can happen both inside and outside of school and online. By definition, it applies to abuse by one child of another child – regardless of the age, stage of development, or any age differential between them. This can include but is not limited to:

- bullying, including cyberbullying, prejudiced-based and discriminatory bullying;
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment including upskirting and online sexual harassment;
- harmful sexual behaviour;
- 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;
- child sexual exploitation;
- child criminal exploitation;
- hate incidents and hate crime;
- racism; and

- initiation/ hazing type violence and rituals.

43.2. The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The School will comply with its obligations as set out in the DfE's National Minimum Standards for Boarding Schools in relation to safeguarding at all times. Details regarding the School's procedures for responding to issues in boarding accommodation can be found in its separate Child-on-Child Abuse Policy.

43.3. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. All forms of child-on-child abuse are unacceptable and will be taken seriously. 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 students. Child-on-child abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

43.4. Please see the School's separate Anti-Bullying and Child-on-Child Abuse policies for further information.

44. CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING

44.1. A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

44.2. When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupils individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE 2025*)*, the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

44.3. Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

PART 4

45. PROMOTING A PROTECTIVE ETHOS

45.1. The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our students. All teaching staff play a vital role in this process, helping to ensure that all students relate well to one another and feel safe and comfortable within the School. 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 students on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that students always adhere to the standards of behaviour set out in the School's Behaviour, Rewards and Sanctions Policy and in enforcing the School's Anti-Bullying Policy.

45.2. As part of the PSHEE, including the Relationships Education (for all primary aged pupils) and Relationships and Sex Education and Health Education for all secondary pupils) curriculum, students 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.

45.3. 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 RS lessons are used to promote tolerance and mutual respect and understanding.

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

46. INDUCTION AND TRAINING

46.1. All staff receive appropriate safeguarding and child protection training which is integrated, aligned and considered as part of the whole school 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.

46.2. Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, neglect and exploitation, bullying or children who may be susceptible to radicalisation into terrorism, 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.

46.3. 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) - to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.
- 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)*
- An in-house Keeping Children Safe in Education update Quiz designed by the safeguarding team
- Guidance for safer working practice for those working with children and young people in education settings (2022) received
- Staff Code of Conduct, which includes reference to maintaining appropriate staff and student 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 are absent from education, particularly on repeat occasions and/or prolonged periods (Attendance Policy)
- Managing a report of child-on-child sexual violence and sexual harassment
- Training in the use of MyConcern

46.4. 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 local authority 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.

46.5. 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.

46.6. All staff receive safeguarding and child protection update training, including in relation to online safety (which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), as required, but at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively, including looked after and previously looked after children.

46.7. 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.

46.8. The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online, filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

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

46.10. The School understands and recognises its obligations under the Equality Act and that the School must not discriminate against students because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support students with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled students.

46.11. The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

47. SAFER EMPLOYMENT PRACTICES

47.1. The School 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 School's Safer Recruitment Policy, Recruitment Pack, Induction Policy and Staff Code of Conduct .

47.2. In line with Part 3 of KCSIE 2025, the governing body prevents people who pose a risk of harm from working with students 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 and, where necessary, have undergone the requisite safeguarding checks. 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.

48. STAFF OBLIGATIONS

48.1. All staff in the School are required to notify the School 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.

48.2. The School 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.

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

49.1. The School's procedures for dealing with any safeguarding allegation or concern (no matter how small) 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 School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. The School will have regard to Part 4 of KCSIE 2025.

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

49.3. The Principal (or Chair of Governors, where applicable) will ensure that the School consults the LADO within one working day and the LADO will advise on all further action to be taken. Before contacting the LADO, the School 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.

49.4. Where the School 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, local authority children's social care and the police will be contacted immediately.

49.5. The School'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 School 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.

49.6. Any allegations of abuse against staff (including supply staff), contractors and volunteers) should be referred immediately to the DSL. 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.

49.7. Should the allegation of abuse concern the School DSL, the member of staff should inform the Executive 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 Executive DDSL, 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.

49.8. The School 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.

49.9. The School 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.

49.10. 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.

49.11. Where the School is considering an allegation against an individual not directly employed by them, where the disciplinary procedures do not fully apply, the School will ensure that allegations are dealt with properly. The School 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 School 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.

49.12. 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.

49.13. The School will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents/carers as set out in its Staff Code of Conduct and 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). 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.

49.14. The school will ensure that staff and volunteers are aware that sexual relationships with students 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).

49.15. The School will ensure that communication between students and adults, by whatever method, is transparent and takes place within clear and explicit professional boundaries and is open to scrutiny.

49.16. 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 (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.

49.17. 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, 2025) will be followed. The Principal or Chair of Governors must inform the LADO 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.

49.18. 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 School 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 School, the School will keep the agency informed.

49.19. 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 or false, no details of the allegation will be retained on the individual's personnel records unless the individual gives their consent for retention of the information. For all other allegations, i.e. substantiated, unfounded and unsubstantiated, the following information will be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, decisions reached and the outcome i.e substantiated, unfounded or unsubstantiated
- a copy provided to the person concerned, where agreed by local authority children's social care or the police, and
- a declaration on whether the information will be referred to in any future reference.

49.20. Allegations proven to be false, unfounded, unsubstantiated or malicious will not be included in employer references.

49.21. In accordance with KCSIE 2025, 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 School 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.

49.22. 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.

49.23. The School 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 School 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.

49.24. During the course of the investigation, the School, in consultation with the LADO, will decide what information should be given to parents, staff and other students 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 2025 relating to reporting restrictions identifying teachers who are the subject of allegations from students.

49.25. Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations.

49.26. Any students who are involved will receive appropriate support.

49.27. In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

49.28. Throughout the process in handling allegations and at the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the School's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases, where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

49.29. Staff should have regard to the School's Staff Code of Conduct to minimise the risk of allegations being made.

50. LOW-LEVEL CONCERNS

50.1. Staff may have a low-level concern which, for the purposes of the School'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.

50.2. All staff have a responsibility to report to the Principal, or the Executive DDSL, if they suspect that an adult may have acted in a manner which is not consistent with the School's Staff Code of Conduct 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 School's Low Level Concerns Policy for further information.

51. USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

51.1. The School's arrangements for safeguarding as set out in this policy shall apply in the case of any before or after school activities and holiday activities directly under the supervision or management of School staff.

51.2. Where services or activities are provided separately by another organisation or individual, either on or off school site, School staff will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the School on these matters where appropriate.

51.3. The School will use the DfE guidance on 'Out-of-school settings: safeguarding advice for providers' (updated May 2025) which details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

51.4. The School will also ensure safeguarding requirements are included in any lease or hire agreement, as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

52. WHISTLEBLOWING

52.1. If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues, including supply staff, contractors and volunteers, which are likely to put students at risk of abuse or other serious harm may be dealt with in accordance with the School'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.

52.2. If staff and volunteers feel unable to raise an issue with the School 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).

53. EXTERNAL REFERRALS

53.1. 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. The School, 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 .

53.2. The School will, in accordance with KCSIE 2025, 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.

53.3. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and the School should ensure that there is sufficient information to meet the referral duty criteria explained in the DBS referral guidance, available on gov.uk.

53.4. The School 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.

53.5. 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 School will consider making a referral to the Teaching Regulation Agency (**TRA**) as required by sections 141D and 141E of the Education Act 2002 (as amended) 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.

53.6. The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

53.7. 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 School, the School will, in accordance with KCSIE 2025, 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 local authority children's social care and the police. All allegations of non recent abuse should be referred to the DSL straight away.

54. POSITION OF TRUST

54.1. 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 student 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.

54.2. 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 School's Employee Handbook, the Staff Code of Conduct and the Online Safety Policy and the Guidance for safer working practice for those working with children and young people in education settings (2022).

55. MONITORING AND EVALUATION OF THIS POLICY

55.1. The School monitors and evaluates its safeguarding policy and procedures through the following activities:

- Governing Body visits to the School;
- 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 School;
- Frequent scrutiny of Governing Body meeting minutes;
- Logs of bullying and/or racist or otherwise discriminatory behaviour incidents are reviewed regularly by the Safeguarding Team at the termly Safeguarding Meeting (which includes the Safeguarding Governors);
- Regular review of parental concerns and parental questionnaires;
- Regular review of the use of student-specific leisure rooms and clubs at lunchtime and after school;
- Regular review of training offered to staff, including e-safety training;
- All safeguarding leads receive regular supervision from a specialist external provider; and
- Attending safeguarding annual conferences.

Version Control

Date of adoption of this policy	8 October 2025
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Policy owner	Designated Safeguarding Lead
Authorised by	Governing Body

Annex 1 (From KCSIE 2025) TYPES OF ABUSE, NEGLECT AND EXPLOITATION

1. TYPES OF ABUSE

1.1. KCSIE 2025 defines the following types of abuse, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or label alone. In most cases, multiple issues will overlap.

1.2. All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the School, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. .

1.3. All staff, but especially the DSL and DDSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

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

1.5. Abuse: 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others . 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.

1.6. 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.

1.7. 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 from 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.

1.8. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 and all staff should be aware of it and of the School's policy and procedures for dealing with it - see the School's Child-on-Child Abuse Policy.

1.8.1. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex (also known as child-on-child abuse). This 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 assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

1.8.2. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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 deliberating brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual and non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); 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.

1.9. 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.

Annex 2: General indicators of abuse

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 mobile[3]
- 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	

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

[3] 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

- 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. <u>SEXUAL ABUSE</u>

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. **<u>EMOTIONAL ABUSE</u>**

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. **<u>NEGLECT</u>**

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

Annex 3

How staff should respond to an incident of nudes and semi-nudes being shared by students

1. All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

2. For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

3. Many professionals may refer to 'nudes and semi-nudes' as:

    - youth produced sexual imagery or 'youth involved' sexual imagery
    - indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
    - 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
    - image-based sexual abuse. This term may be used when referring to the non consensual sharing of nudes and semi-nudes

4. Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

5. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

6. If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible.

7. The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (updated March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

    - Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
    - Carrying out interviews with the children involved (if appropriate).
    - Informing parents and carers at an early stage and keeping them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made

in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

8. An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

    - The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
    - There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
    - The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
    - The images involves sexual acts and any child or young person in the images or videos is under 13.
    - There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

9. If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head of School, as appropriate. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

10. This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

Annex 4

USE OF MOBILE DEVICES INCLUDING CAMERAS AND OTHER SMART DEVICES

1. Background

1.1. It is widely recognised that many children have access to personal communication devices including mobile phones, smart phones and smart watches. Children using these devices are likely to have unlimited and unrestricted access to the internet via mobile networks such as 3G, 4G and increasingly 5G. For many these devices can provide security and reassurance; however there are also associated risks. Safeguarding of children within the School is paramount.

1.2. Effective guidance is in place to avoid the use of mobile, smart phone and smart watches causing unnecessary disruptions and distractions within the workplace, and to ensure effective safeguarding practice is promoted to protect against potential misuse.

1.3. The terms 'phone' or 'mobile phone' in this guidance denote mobile phones, smart phones, airpods, iPods, iPads, MP3 players, MP4 players and smart watches.

2. Staff responsibilities

2.1. All staff (including teachers, support staff, and supply staff) may wish to have their personal mobile phones at work for use in case of emergencies, however, there is a clear expectation that all personal use is limited to areas and times when there are no children present or likely to be present. Mobile phones and other devices should be connected to the School wifi.

2.2. The school expects all staff to lead by example and therefore should not make or receive personal calls, or texts (via mobile phone or smart watch), whilst children are present or during contact time.

2.3. All staff (including volunteers and supply staff) should only use their mobile phones and smart devices for personal contact in designated areas such as a staff room.

2.4. Other than in agreed exceptional circumstances, mobile phones should be switched off or on silent and left in a safe place and smart watches silenced during lesson times.

3. Safeguarding

3.1. Staff should not contact students or parents from their personal mobile phone in or out of school time or give their mobile phone number to students or parents. If a member of staff needs to make telephone contact with a student, a school telephone should be used.

3.2. Staff should not share personal contact details through social media and messaging apps.

3.3. Staff should regularly monitor and update their privacy settings on social media sites.

3.4. Staff should never accept a 'friend request' or respond to any posts from students that may deliberately or inadvertently include them, but inform their line manager or Senior Leader of the contact.

3.5. Staff should never send to, or accept from, colleagues or students, texts or images that could be viewed as inappropriate.

4. Photographs and videos

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

4.2. Parents/carers have given permission for their children's photographs to be taken when they join the School under the terms and conditions. Staff will be made aware where permission has not been given.

4.3. If photos or videos are being taken as part of the school curriculum or for promotional purposes then school equipment must be used. Staff should not allow themselves to be photographed by a student(s). Storage of the images should be on School storage only, on School computers or other School devices and on secure School accounts on social media.

4.4. 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.

4.5. Children in photos on display in any forum (including media and social media) should not be named by their full name.

4.6. Staff are not permitted to take photos or videos of students or anything else (e.g., work) that might identify the student.

4.7. When publishing images of children in documents or on the website/for social media 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.

4.8. 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.

4.9. 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.

5. Using a personal mobile for work purposes

5.1. In some circumstances, it may be appropriate for staff to use a personal mobile phone for work purposes. Where possible this should always be agreed with a line manager or Senior Leader in advance. Such circumstances may include, but are not limited to:

- Emergency evacuations;
- Parental contact in emergencies (mobile phones setting that allow for the number not to be identified should be used);
- Contact between staff members on School trips and visits.

5.2. This guidance should be seen as a safeguard for members of staff and the school. Any breach of school policy may result in disciplinary action against that member of staff.

6. Students

6.1. We recognise that the majority of students will bring mobile phones to school and many may well wear a smart watch. Expectations around phone and smart watch usage should be clearly communicated to all students and parents:

6.1.1. **Years 1-6**

- Pupils are dissuaded from bringing mobile phones to school.
- If it is deemed necessary for a pupil to bring a mobile phone to school, (e.g., in the case of older pupils because they travel to and from school independently), then the pupil must hand their phone into the school reception at the start of the day.

6.1.2. **Years 7-11**

- During the school day, mobile phones must not be seen and must be kept in airplane mode or equivalent.
- Students are permitted to use mobile devices briefly during late stay to make travel arrangements or in exceptional circumstances with permission from a member of staff.
- Any access to the internet must be via the School's WiFi network - no cellular data usage is allowed.
- Smart watch capabilities are in line with smart phones (except for taking photos and video) and are therefore treated in the same way for the purposes of this policy.

6.1.3. Years 12-13

- The use of personal electronic devices (including but not limited to mobile phones, smart watches, tablets, laptops) in lessons should only be for learning purposes. During this time such devices should be put in airplane mode or equivalent.
- Whenever on site, students should only connect their devices via the school's WiFi network - no cellular data use is allowed.

7. Parents, visitors and contractors

7.1. Parents, visitors and contractors are respectfully requested not to use their mobile phones at all on the school site/in any area where children/students are present.

7.2. Should phone calls and/or texts need to be taken or made, use is restricted to those areas not accessed by children to avoid any unnecessary disturbance or disruption to others.

7.3. Should phone calls/and or texts need to be taken or made, visitors are asked to leave the premises to do so.

7.4. Photos or videos of children must not be taken without prior discussion with a member of the Senior Leadership Team or site Safeguarding Lead and in accordance with the UK *General Data Protection Regulations (GDPR) and the Data Protection Act 2018*. Any individual bringing a personal device into the school must ensure that it contains no inappropriate or illegal content.

8. Inappropriate or illegal content

8.1. Where there is a suspicion that the material on a mobile phone may be unsuitable and may constitute evidence relating to a criminal offence, the allegations process will be followed (please refer to the School's Safeguarding and Child Protection Policy).

9. Liability

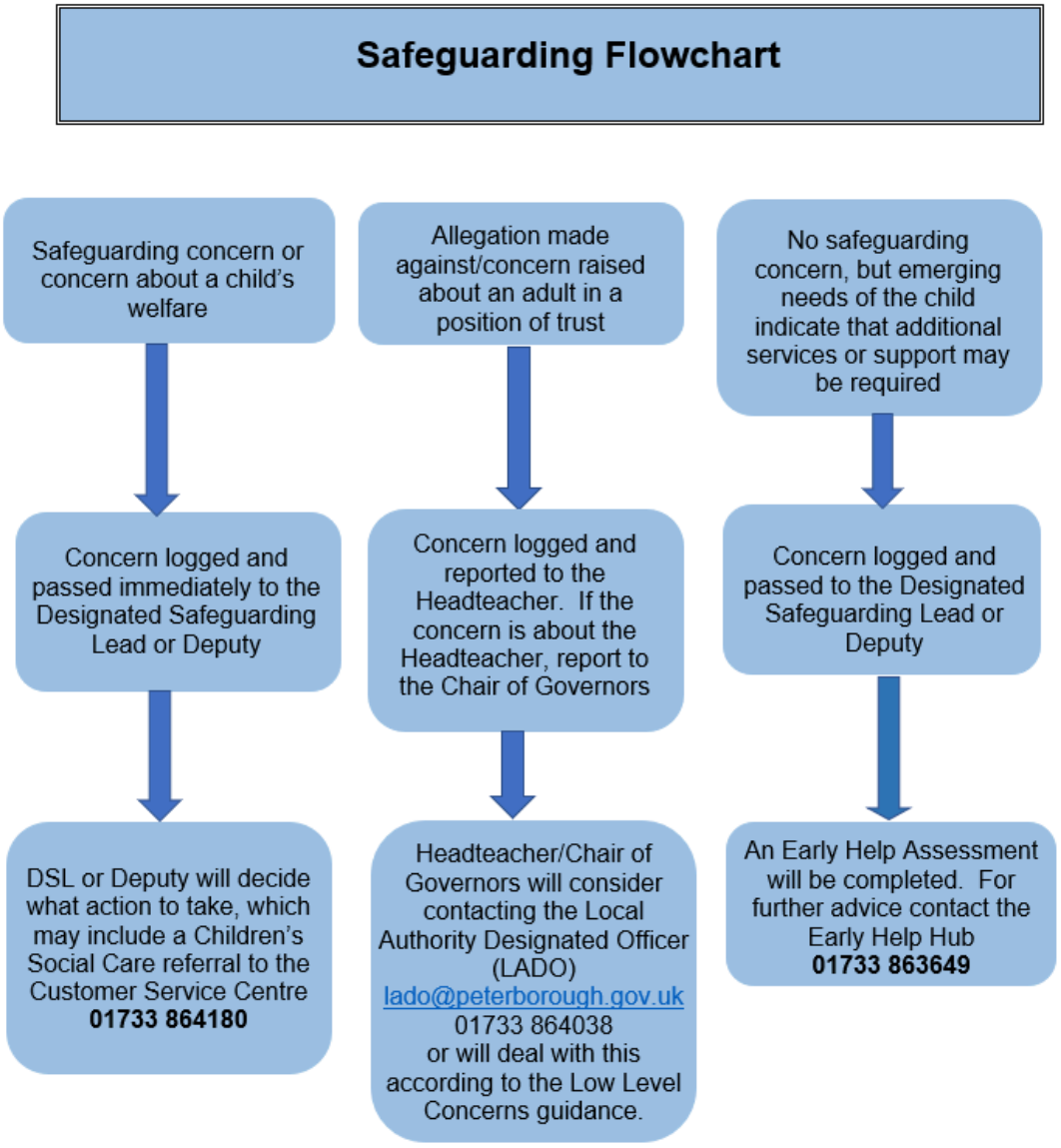
9.1. For both staff and students, the School retains no liability for any device that is brought into school which is either lost, stolen or damaged.

9.2. For both staff and students, the School retains no liability for any device that is used in a manner that is against the owner's consent.

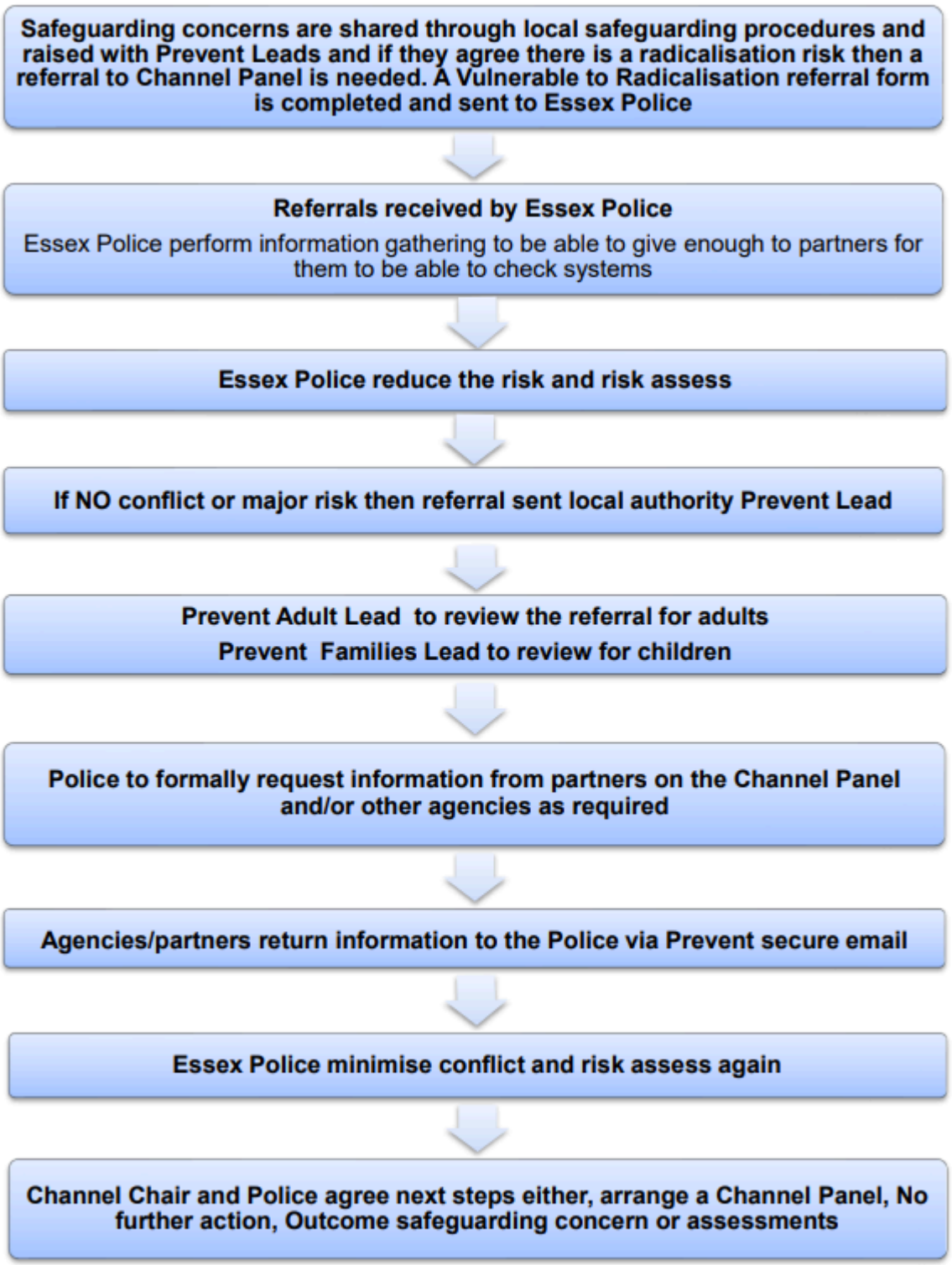
10. Related Policies and guidance:

- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings (updated February 2022)
- Keeping Children Safe in Education (September 2025)
- Guidance for schools and other establishments on photographing and filing children (NSPCC, updated June 2025)
- DfE Toolkit - Data Protection in Schools (updated June 2025)
- DfE guidance: Meeting digital and technology standards in schools and colleges (updated March 2025)

Annex 5:
Cambridgeshire County Council Education Child Protection Service Safeguarding Flowchart

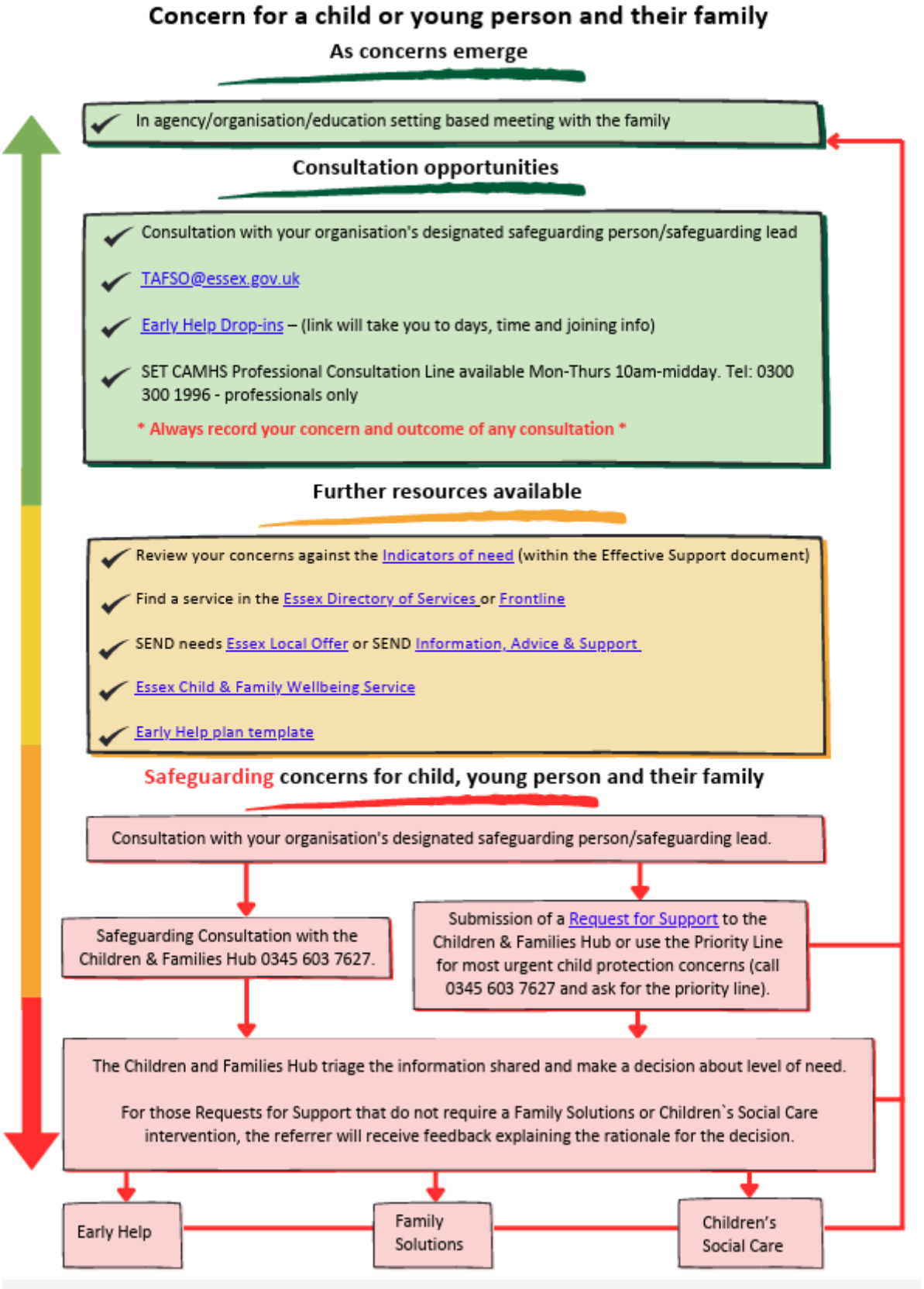


Annex 6: ESCB PREVENT Referral Flowchart (Page 12, ESCB PREVENT Policy and Guidance)



For Cambridgeshire and Peterborough, information on referrals and the referral procedure is available at:
https://www.safeguardingcambspeterborough.org.uk/children-board/professionals/prevent/

Annex 7: Essex Safeguarding Children Board: Concern for a Child or Young Person flow chart



Annex 8: The Essex Effective Support Windscreen (pages 11 and 12, Effective Support for Children and Families in Essex 2024)

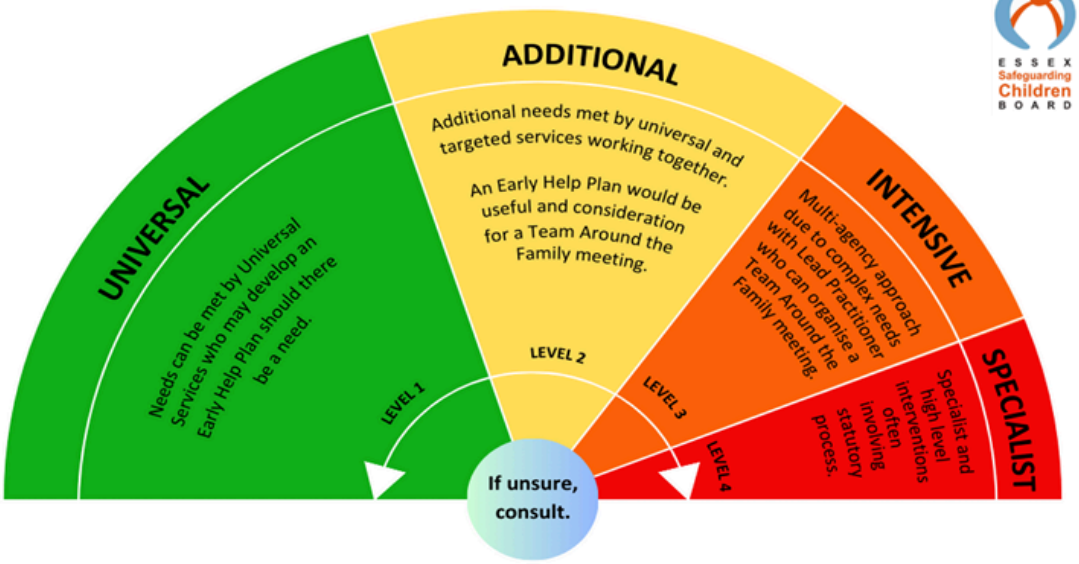
The Effective Support Windscreen

In Essex the levels of need are represented on the windscreen of need. It is intended to provide practitioners with a shared understanding and common language around needs and harm.

This is a conceptual model of need and in reality, children and families will move across the windscreen. It will not be the same for each child or family; it is a means of providing needs led appropriate access to services, when considering the type of support needed. Some children and families will need additional support that they will source directly from the relevant agencies; others may need support to navigate the early help system. Some children and families will require short term support following a specific incident whilst others will require longer more intensive support from a range of agencies.

Children with Special Educational Needs and Disabilities (SEND) are subject to the same safeguarding concerns and support pathways as all other children in Essex. In addition, they may also receive support under Section 17 of the Children Act 1989 (more information in page 17).

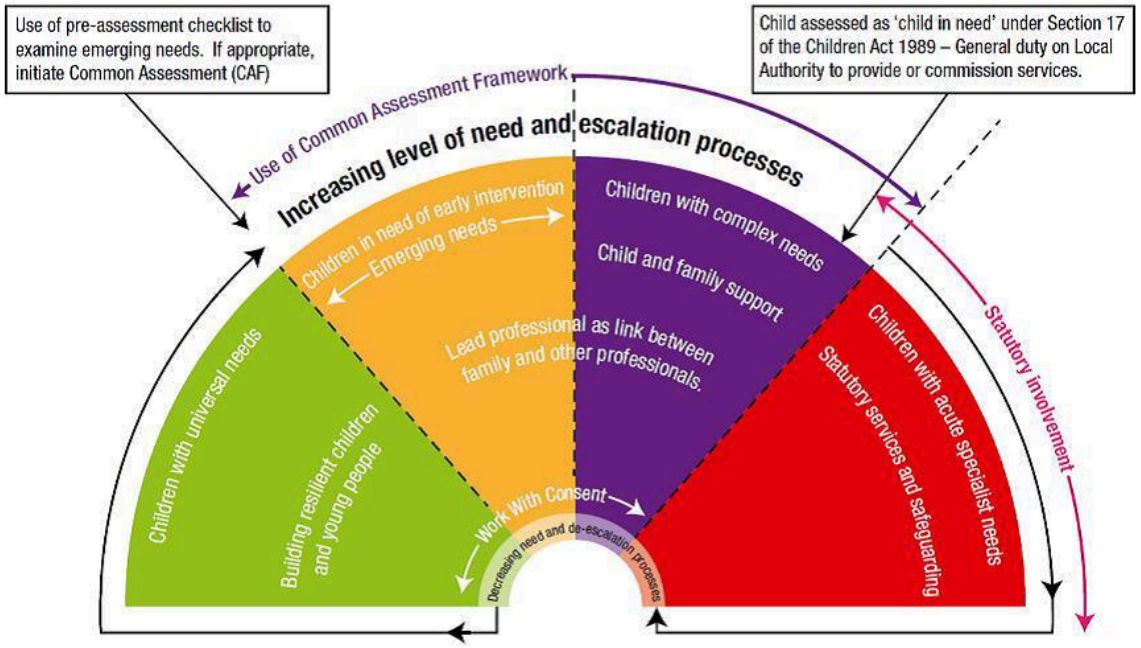
The Effective Support Windscreen



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 and their families at the lowest level possible in accordance with their needs.

Annex 9: Cambridgeshire & Peterborough Safeguarding Partnership Board - Cambridgeshire Threshold Document: Continuum of Help and Support

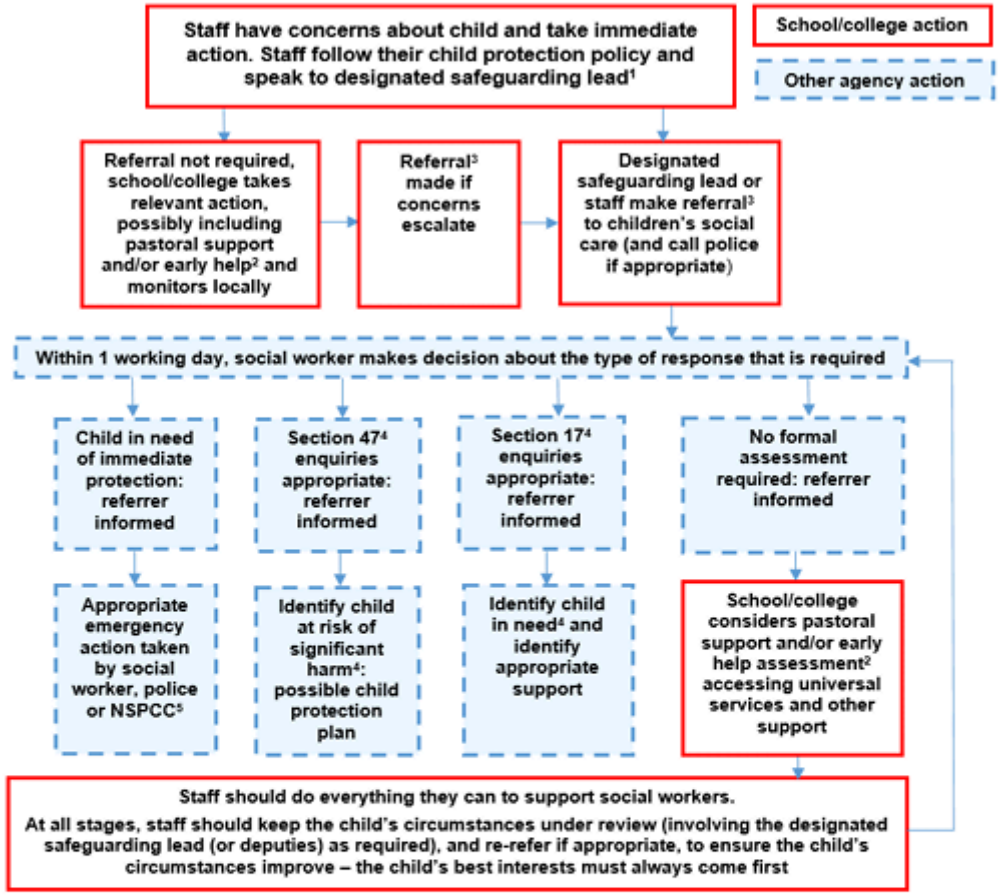
Continuum of Need



Annex 10 - A flowchart setting out the actions taken where there are concerns about a child (KCSIE 2025)

A flowchart setting out the actions taken where there are concerns about a child

Figure 1



[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. 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. See 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 Working Together to Safeguard Children.

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