

Name of Policy:	Safeguarding and Child Protection Policy
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Approved by:	Local Governing Board
Consultation	Leadership Team
LT Owner:	Assistant Principal
To be reviewed	Annually

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INTRODUCTION

Everyone has a responsibility for safeguarding students.

Long Road Sixth Form College fully recognises the responsibility it has under section 175 of the Education Act 2002 (as amended) and the Education and Training (Welfare of Children) Act, 2021 to have arrangements in place to safeguard and promote the welfare of young people and vulnerable adults and prevent their abuse.

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18.

This responsibility is more fully explained in the statutory guidance for colleges "Keeping Children Safe in Education" (September 2024). All staff are made aware of their duties and responsibilities under part one of this document.

Staff should read and sign to indicate that they have read the above document together with 'Annex B' of 'Keeping Children Safe in Education', 2024 and 'What to do if you're worried a child is being abused: Advice for practitioners' (March 2015) if they are working directly with children.

Through their day-to-day contact with students and direct work with families all staff in college have a responsibility to:

- Identify concerns early to prevent them from escalating;
- Provide a safe environment in which students can learn;
- Identify students who may benefit from early help;
- Know what to do if a child tells them he/she is being abused or neglected **or exploited**;
- Follow the referral process if they have a concern.

This policy sets out how the college's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of young people and vulnerable adults who are students at the college. Our policy applies to all staff, paid and unpaid, working in the college including governors. Learning Support Assistants, site and office staff as well as teachers can be the first point of disclosure for a student. Concerned parents/carers may also contact the college and its governors.

This policy is available to parents on request and is on the college website. It is consistent with the Safeguarding Children Partnership Board procedures.

There are four main elements to our policy:

- **PREVENTION** through the teaching and pastoral support offered to students and the creation and maintenance of a whole college protective ethos;
- **PROCEDURES** for identifying and referring cases, or suspected cases, of abuse or exploitation. The definitions of the four categories of abuse are attached (see Appendix A);
- **SUPPORTING YOUNG PEOPLE** particularly those who may have been abused or witnessed violence towards others;
- **PREVENTING UNSUITABLE PEOPLE WORKING WITH STUDENTS**

Processes are followed to ensure that those who are unsuitable to work with students are not employed

1. PREVENTION

- 1.1 We recognise that high self-esteem, confidence, supportive friends and good lines of communication with trusted adults help to protect students.
- 1.2 The college will therefore:
 - 1.2.1 Establish and maintain an environment where students feel safe in both the real and the virtual world and are encouraged to talk and are listened to.
 - 1.2.2 Develop a whole college protective ethos in which child on child abuse, including sexual violence and sexual harassment will not be tolerated.
 - 1.2.3 Be aware that safeguarding incidents and behaviours can be associated with factors outside the college and that children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms including sexual exploitation, online harassment, criminal exploitation, and serious youth violence.
 - 1.2.4 Ensure students know that there is a safeguarding team in the college who they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate.
 - 1.2.5 Provide regular training to ensure that staff understand their responsibility for safeguarding and promoting the welfare of students.
 - 1.2.6 Ensure all staff read as a minimum, Part 1 and Annex B of the statutory guidance 'Keeping Children Safe in Education' (2024), the College Staff Code of Conduct and this policy.
 - 1.2.7 Provide training and guidance for staff about avoiding situations in which allegations may be made against them particularly when working in one-to-one situations with students.
 - 1.2.8 Include in the curriculum activities and opportunities which equip students with the skills they need to stay safer from abuse both in the real and the virtual world and information that certain types of behaviour within relationships and online are criminal and information about who to turn to for help.
 - 1.2.9 Incorporate into the curriculum activities, and opportunities that enable students to develop their understanding of stereotyping, prejudice and equality.
 - 1.2.10 Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing/have experienced with teachers and college and leadership staff.

2. PROCEDURES

- 2.1 We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures'. A copy of these procedures can be found on their website:
<http://www.safeguardingcambspeterborough.org.uk/children-board/>
- 2.1.1 The Designated Safeguarding Lead is: Harriet Riches, Assistant Principal
- 2.1.2 The Deputy Designated Safeguarding Lead is: **Eve Taylor**
- 2.1.3 The following members of staff have also received the Designated Safeguarding Lead training:
Steve Dann
Karen Everitt

Jenny Kavanagh

Lisa Verrier

Donna Dishaw

Anna-Lisa Ghale

2.1.4 The nominated governor for Safeguarding and Child Protection is: Jenny O'Hare

2.2 The college will:

- 2.2.1 Appoint a senior member of staff to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection and lead the support and guidance for staff on safeguarding and welfare issues.
- 2.2.2 Ensure that the role of DSL and DDSL is explicit in the role holders' job description (as outline in Keeping Children Safe in Education, 2024 Annex C)
- 2.2.3 Ensure that the Designated Safeguarding Lead and other members of the safeguarding team (Deputy Designated Safeguarding Leads, DDSL) have undertaken the two day training provided by the **Cambridgeshire Education Safeguarding Team** and that this training is updated at least every two years and they take available opportunities to regularly refresh their knowledge and skills. While the activities of the DSL can be delegated to appropriately trained deputies, the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.
- 2.2.4 Nominate a governor for safeguarding and child protection who has undertaken appropriate training and who will meet termly with the Designated Safeguarding Lead. The governor for safeguarding will have oversight of the application of the safeguarding policy and will report on student safeguarding matters to the **Local Governing Board**.
- 2.2.5 Ensure that every member of staff, paid and unpaid, and the governing body knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concern from the **point of induction**. Staff members are required to complete a logging concern form and pass it in person to the Safeguarding team immediately.
- 2.2.6 Ensure that there are members of the safeguarding team available during college hours, in term-time, to discuss any safeguarding concerns and all staff are clear upon the course of action they must take if, in exceptional circumstances, a member of the team is not available or a concern arises outside normal college hours. In order to avoid delay to appropriate action being taken, during college breaks staff should contact the duty manager, or if unavailable, the Principal. Out of hours, where the staff member suspects that the student is at risk of immediate harm, they should call the Police on 999. Where the staff member has serious but not critical concerns about child protection, they should call the local authority social care referrals Customer Service Centre for advice. In these circumstances, any action taken should be shared with the DSL/DDSL as soon as is practically possible.
- 2.2.7 Ensure all staff members undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering access to internet sites to ensure compliance and monitoring search terms) at induction and ensure that staff training is **regularly updated** and at least every three years.
- 2.2.8 Ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to students and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policy, including low level concerns and allegations against

staff.

- 2.2.9 Maintain vigilance in the follow-up of student absence procedures, recognising that being 'missing from education' can be an indicator of potential risk.
 - 2.2.10 Have in place procedures for reporting cases, or suspected cases of abuse including female genital mutilation about a female under 18, child sexual exploitation, honour-based violence and forced marriage. There is a mandatory duty on teachers to report to the police cases where they discover that an act of FGM has been carried out. This should be done immediately after the designated person has been informed.
 - 2.2.11 Report cases of private fostering if a student is under 16 or under 18 and registered disabled.
 - 2.2.12 Have in place records of and support for 'Looked After' and 'Previously Looked After' Children.
 - 2.2.13 Ensure that the college is vigilant in protecting students from child on child abuse, recognising the gender issues that can be prevalent when dealing with such abuse which may include physical, emotional, sexual and/or financial abuse, coercive control, exploitative relationships, harmful sexual behaviour and violence, sharing of sexual materials or 'nudes' (with or without consent) and upskirting.
 - 2.2.14 Have in place age-appropriate measures to filter and monitor on-line activity.
 - 2.2.15 Have in place measures to protect students with Special Educational Needs and Disabilities (SEND) understanding that additional barriers can exist when recognising abuse in these students.
 - 2.2.16 Liaise with the three safeguarding partners (Local Authority, clinical commissioning group and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2023.
 - 2.2.17 Complete the Safeguarding Children Partnership Board's Exploitation (CSE/Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation or child sexual exploitation.
 - 2.2.18 Work in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.
 - 2.2.19 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.
 - 2.2.20 Ensure that this policy is available publicly via the college website www.longroad.ac.uk.
 - 2.2.21 Help promote education outcomes by sharing the information about the welfare, safeguarding and child protection issues that students who have, or have had, a social worker are experiencing with teachers and college leadership staff.
- 2.3 Before and after College activities (on or off college site)
- 2.3.1 For before or after college activities directly under the supervision or management of college staff, the college's arrangements for safeguarding as written in this policy shall apply.
 - 2.3.2 Where services or activities are provided separately by another body, either on or off college site, the college will check that the body concerned has appropriate policies and procedures in place for safeguarding students and child protection and there are

arrangements to liaise with the college on these matters where appropriate.

2.4 Multi-Agency Working

The college will:

- 2.4.1 Work to develop effective links with relevant services to promote the safety and welfare of all students.
- 2.4.2 Co-operate as required, in line with 'Working Together to Safeguard Children,' (July 2018), with key agencies in their enquiries regarding safeguarding matters including attendance and providing written reports at child protection conferences and core groups.
- 2.4.3 Notify the relevant Social Care Unit immediately if:
 - it should have to exclude a student who is subject to a Child Protection Plan (whether fixed term or permanently);
 - there is an unexplained absence of a student who is subject to a Child Protection Plan;
 - there is any change in circumstances to a student who is subject to a Child Protection Plan.
- 2.4.4 When a student who is subject to a child protection plan leaf, information will be transferred to the new college immediately. The Child Protection Chair and Social Care Team will also be informed

2.5 Record Keeping

The college will:

- 2.5.1 Keep clear, detailed, accurate, written records of concerns about students (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately.
- 2.5.2 Ensure that all concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing.
- 2.5.3 Ensure that records will include:
 - A clear and comprehensive summary of the concern;
 - The young person'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 parent or other agencies.
- 2.5.4 Ensure all paper records are kept securely, separate from the main student file, and in a locked location.
- 2.5.5 Ensure all electronic records are stored on the secure platform, My Concern.
- 2.5.6 Ensure all relevant child protection records are sent to the receiving college or establishment when a student moves colleges within five days in accordance with 'Keeping Students Safe in Education' (2024, p. 173) and the [Cambridgeshire Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records](#). The DSL will consider whether it would be appropriate to share information with the new college in advance of a student leaving.
- 2.5.7 Make parents aware that such records exist except where to do so would place the

child at risk of harm.

- 2.5.8 Ensure all actions and decisions are led by what is considered to be in the best interests of the child.

2.6 Confidentiality and information sharing

- 2.6.1 Information about students and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

- 2.6.2** The Data Protection Act 2018 and the UK GDPR do not prevent college staff from sharing information with relevant agencies, where that information may help to protect a child.

The college will:

- 2.6.3 Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.
- 2.6.4 Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard students, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, [May 2024](#)).
- 2.6.5 Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a student or parent they will refer the request to the **Data Controller** or Principal.
- 2.6.6 Ensure staff are clear with students that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Personnel will:

- 2.6.7 Disclose information about a student to other members of staff on a 'need to know' basis, considering what is necessary, proportionate and relevant. Parental consent may be required.
- 2.6.8 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 where not to do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.
- 2.6.9 In cases where the 'serious harm test' is met, withhold providing the data in compliance with colleges' obligations under the Data Protection Act 2018 and the UK GDPR.
- 2.6.10 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' [2024](#))
- 2.6.11 Seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, [May 2024](#)).

2.7 Communication with Parents/Carers

The college will:

- 2.7.1 Ensure that parents/carers are informed of the responsibility placed on the college and staff in relation to child protection by setting out its duties in the college website.

- 2.7.2 Undertake appropriate discussion with parents/carers prior to involvement of another agency, unless the circumstances preclude this action.
- 2.7.3 Seek advice from Children's Social Care if the college believes that notifying parents could increase the risk of harm to the child. Particular circumstances where parents **may not** be informed include any disclosure of sexual abuse or physical abuse where the young person has an injury or where it may lead to loss of evidence. *Further guidance on this can be found in the Effective Support for Children and Families in Cambridgeshire and Peterborough.*
- 2.7.4 Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, record the reasons why.
- 2.7.5 Share students' personal information only with the student and the Next of Kin(s) identified by the student and recorded on their file. Should another person or relative (including those holding 'Parental Responsibility') who is not listed as Next of Kin request information concerning the student, permission must be sought from the student before any information is shared. When the College seeks permission from the student, the student will be informed that as 'data subject', they have ownership of their personal information ('personal data'); that they can decide with whom they share their data; and that the College will not share the nature or outcome of that decision or the details of any person with whom they decide to share that data with anyone else (including listed Next of Kin(s)), unless the student or other person is at immediate risk from harm.

2.8 Child on Child Abuse

We recognise that child on child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting (part of the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. 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.

2.8.1 All forms of child-on-child abuse are unacceptable and will be taken seriously.

The college will therefore:

- 2.8.2 Create a whole college protective ethos in which child on child abuse, including sexual violence and sexual harassment will not be tolerated.
- 2.8.3 Provide training and guidance for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with young women more likely to be victims and young men perpetrators.
- 2.8.4 Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or 'banter'.
- 2.8.5 Include within the curriculum and enrichment programmes, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online, and teaching about consent.
- 2.8.6 Staff should be aware that some groups are potentially more at risk. Evidence shows young women, young people with special educational needs and disabilities (SEND) and LGBT young people are at greater risk.

- 2.8.7 Recognise the risk of intra-familial harms and provide support to siblings following incidents when necessary.
- 2.8.8 The DSL/DDSL will refer to the Safeguarding Children Partnership Boards's [Child-Sexual-Behaviour-Assessment-Tool.pdf \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk) if there is a concern that a young person may be displaying sexually harmful behaviours.

2.9 Dealing with Sexual Violence and Sexual Harassment between young people

- 2.9.1 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2.9.2 Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

The college will:

- 2.9.3 Be clear that sexual violence and sexual harassment will not be tolerated.
- 2.9.4 Provide training for staff on how to manage the report of sexual violence or sexual harassment.
- 2.9.5 Make decisions on a case-by-case basis.
- 2.9.6 Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.9.7 Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 2.9.8 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 2.9.9 Liaise closely with external agencies, including police and social care, when required.
- 2.9.10 Refer to 'Keeping Children Safe in Education - Part Five', 2024, for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, March 2024)

3. SUPPORTING STUDENTS

The college recognises that **any** young person or vulnerable adult may be subject to abuse and neglect and 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 and as such will support all students by:

- 3.1 Providing curricular opportunities to encourage self-esteem and self-motivation
- 3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community
- 3.3 Applying the college's Code of Conduct effectively. Adopting a consistent approach, which focuses on the behaviour of the student but does not damage their sense of self-worth
- 3.4 Making decisions about appropriate support for students on a case-by-case basis.
- 3.5 Reassuring students making disclosures or allegations that they are being taken seriously, that their wishes will be into account in any decision making and that appropriate support will be made available
- 3.6 Implementing measures to keep the victim, alleged perpetrator and if necessary other students and staff members, safe where allegations are made which involve other members of the college community
- 3.7 Providing appropriate support for staff to whom a disclosure has been made.
- 3.8 Liaising with other agencies which support the student such as Social Care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help (Targeted Support) Teams.
- 3.9 Promoting productive and supportive relationships with parents/carers.
- 3.10 The college 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).
- 3.11 Staff are required to be particularly alert to the potential need for early help for a student in particular circumstances. Please see page 10 of Keeping Children Safe in Education (2024) for the complete list. The list includes:
 - Students with disabilities, certain health conditions, physical or mental health needs, additional needs or special educational needs (whether or not they have an EHCP);
 - Young Carers;
 - Young people at risk of criminal exploitation;
 - Students frequently missing from care or from home;
 - Young people frequently absent from education **or with unexplainable absences**;
 - Young people misusing drugs or alcohol, or living with substance misusing parents/carers;
 - Those in family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
 - Young people with a family member in prison, or is affected by parental offending;
 - Young people in care or care-experienced;
 - Privately fostered children;

- Those at risk of ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage. The new Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18. It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used. The College will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.
- **Honour-Based Abuse can be defined as:**
- ‘An incident or pattern of violence, threats of violence, intimidation, coercion, control or abuse (including but not limited to psychological, physical, sexual, economic, spiritual, faith-related or emotional abuse) motivated by the perpetrator’s perception that an individual has shamed, or may shame, the perpetrator, the family, or community or has otherwise broken, or may break, the perceived norms of the community’s accepted behaviours, including by speaking out about the abuse and where the perception of shame may also prevent a victim from accessing support or help.’
- Young people susceptible to extremist ideology and radicalisation. Staff are required to be alert to changes in children’s behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The DSL is aware of local procedures for making a Prevent referral. The following member of staff is the Prevent Lead and has undertaken Prevent Lead training: Harriet Riches, Assistant Principal.

The school’s/college’s Designated Safeguarding Lead (and Deputies) should be aware of local procedures for making a Prevent referral using the Prevent National Referral Form found on the Cambridgeshire and Peterborough Safeguarding Board website.

[National Prevent referral form \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)
See also Prevent Duty Guidance: for England and Wales,’ HM Government, (March 2024).

4. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH STUDENTS

- 4.1.1 The college will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part three of ‘Keeping Children Safe in Education’ (September 2024) and the local authority’s Safer Recruitment Policy.
- 4.1.2 The college will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

4.2 Allegations that may meet the harms threshold (Part Four, Section One)

- 4.2.1 Any allegation of abuse made against a teacher (including supply staff, other staff, volunteers and contractors) that meets the harms threshold as set out in Keeping Children Safe in Education, 2024, Part Four, Section One, will be reported straight away to the Principal.
- 4.2.2 In cases where the Principal is the subject of an allegation, it will be reported to the Chair of Governors. (See Allegations flowchart Appendix C.) The college will follow the procedures set out in Part four of ‘Keeping Children Safe in Education’

(September 2024).

- 4.2.3 The college will consult with the Local Authority Named Senior Officer in the event of an allegation being made against a teacher, member of supply staff or other staff, volunteer or contractor and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', (September 2024) and the college HR policies.
- 4.2.4 The Principal will liaise with the Local Authority Designated Officer (LADO) ensuring that all allegations are reported to the LADO within one working day. Following consultation with the LADO, the Named Senior Officer will advise on all further action to be taken. Please note that the Head Teacher or Chair of Governors should **not** seek to interview the child/ren or members of staff involved until advice has been sought. Doing so may compromise any police interviews that may be necessary.
- 4.2.5 Before contacting the LADO, the college will 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.
- 4.2.6 Where the college identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.
- 4.2.7 The college will consider:
- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
 - **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- 4.2.8 The college will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the college and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- 4.2.9 Staff 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 should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that students are protected.

4.3 Concerns that do not meet the harms threshold (Part Four, Section Two)

- 4.3.1 Low level concerns that do not meet the harms thresholds should be reported to the Principal. NB: the term 'low level' does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.
- 4.3.2 In cases where the Principal is the subject of an allegation, it will be reported to the Chair of Governors. The college will follow the procedures set out in Part Four, Section 2 of 'Keeping Children Safe in Education', 2024.
- 4.3.3 The college will deal with any such concern, no matter how small, where an adult working in or on behalf of the college may have acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 4.3.3.1 All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- 4.3.3.2 The college will ensure that these records are kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records are kept in hard copy on the affected staff member's file.
- 4.4 Consideration must be given to the needs of the student and a recognition that a young person may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a young person to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.
- 4.4.1 The college will ensure that all staff, including supply staff, volunteers and contractors, are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents/carers as advised within the Local Authority's Code of Conduct. As part of the Induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all students, especially those with a disability or who are vulnerable adults.
- 4.4.2 All staff have signed to confirm that they have read a copy of the Local Authority's Code of Conduct, 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022) and "Keeping Children Safe in Education" Part 1 and Annex B (September 2024).
- 4.4.3 The college will ensure that staff and volunteers are aware that sexual relationships with students are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).
- 4.4.4 The college will ensure that communication between students and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny.

5. GOVERNING BODY SAFEGUARDING & CHILD PROTECTION RESPONSIBILITIES

5.1 Governing bodies should ensure they facilitate a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

5.2 The governing body fully recognises its responsibilities with regard to child protection and safeguarding and promoting the welfare of students. It aims to ensure that the policies, procedures and training in college are effective and comply with the law and government guidance at all times.

It will:

- Nominate a governor for safeguarding and child protection who will take leadership responsibility for the college's safeguarding arrangements and practice and champion child protection issues.
- Ensure that all governors receive appropriate governor safeguarding and child protection training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures are effective. The training will be regularly updated.
- Ensure an annual report (Annual Safeguarding Monitoring Report) is made to the full governing body, and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed and updated and shared with staff. It will be published on the college website.
- Ensure that students' exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems.
- Ensure students' wishes and feelings are taken into account where there are safeguarding concerns.

5.3 Use of college premises for non-college activities

5.3.1 If the governing body provides extended college facilities or before or after college activities directly under the supervision or management of college staff, the college's arrangements for safeguarding as written in this policy shall apply.

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

5.3.3 **The local governing board will use the guidance on 'Keeping children safe in out-of-school settings' (Sep 2024) which details the safeguarding arrangements that schools and colleges should expect these providers to have in place.**

5.3.4 **The local governing board will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. 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.**

5.3.5

This document will be reviewed and updated according to developments and advice from government and the local authority.

This policy was ratified on...26 September 2024.....and will be reviewed annually.

6.

OTHER RELATED POLICIES AND PROCEDURES

This policy links to policies for:

SEND & Additional Learning Support

Acceptable Use of IT

Attendance

Children on Site

Complaints procedure

Confidentiality

Disciplinary Procedure for staff

External Speakers & Events

Grievance Procedure for staff

Health and Safety

Lone Working policy

Student Code of Conduct

Staff Code of Conduct

Student Harassment and Anti-Bullying

Whistleblowing

Work Experience

Protection and Use of Internet

Appendix A

Categories of abuse, neglect and exploitation

Appendix A

Physical Abuse - 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.

Neglect - 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. It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs. It also includes parents or carers 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
- Ensure access to appropriate medical care or treatment
- Provide suitable education

Emotional Abuse - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are: worthless; unloved; inadequate; valued only insofar as they meet another person's needs

It may include:

- not giving the child opportunities to express their views
- deliberately silencing them
- 'making fun' of what they say or how they communicate

It may also feature age or developmentally inappropriate expectations being imposed on students including:

- interactions that are beyond the child's developmental capability
- overprotection and limitation of exploration and learning
- preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying) causing students frequently to feel frightened or in danger
- The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone

Sexual Abuse – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities involving:
 - students in looking at, or in the production of, sexual images,
 - students in watching sexual activities
 - or encouraging students to behave in sexually inappropriate ways
- grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child Criminal Exploitation - Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE 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.

Useful Contacts - Cambridgeshire

Cambridgeshire and Peterborough Safeguarding Children Partnership Board –
Safeguarding Multi-Agency Procedures

<http://www.safeguardingcambspeterborough.org.uk/children-board/>

Education Safeguarding Team ECPSGeneral@cambridgeshire.gov.uk

Police Child Abuse Investigation Unit Tel: 101

Useful Contacts - Cambridgeshire

Education Safeguarding Manager – Sara Rogers sara.rogers@cambridgeshire.gov.uk

Early Help Hub (EHH) [Target Support Service](#) Tel: 01480 376666

Customer Service Centre – social care referrals Tel: 0345 045 5203

Emergency Duty Team (out of hours) Tel: 01733 234724

Local Authority Designated Officer (LADO)

LADO@cambridgeshire.gov.uk Tel: 01223 727967

Senior Education Adviser – Phil Nash Tel: 07920 270820

Prevent Officers prevent@cambs.police.uk

Tel: 01480 422 277

Relevant Documents

“Keeping Children Safe in Education: Statutory guidance for schools and colleges”
(September 2024)

“Guidance for Safer Working Practice for those working with students and young people in
education settings” (February 2022)

“Information sharing: Advice for practitioners providing safeguarding services to students,
young people, parents and carers” (May 2024)

“Meeting digital and technology standards in schools and colleges, Filtering and
monitoring standards for schools and colleges” (March 2023)

“The Prevent Duty, Departmental advice for colleges and childcare providers” (June 2015)

“Prevent Duty Guidance: for England and Wales” (March 2024)

“Revised Prevent Duty Guidance: for England and Wales” (July 2015)

“Sexting in colleges and colleges: Responding to incidents and safeguarding young people”
published by the UK Council for Child Internet Safety (UKCCIS) – (September 2016)

Sharing nudes and semi-nudes: advice for education settings working with children and
young people (UKCIS, March 2024)

“What to do if you’re worried a child is being abused: Advice for practitioners” (March,
2015)

“When to Call the Police: guidance for schools and colleges,” (National Police Chief
Council)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard
and promote the welfare of children” (December 2023)

Dealing with Allegations or Working with Children

Concerns about an Adult Appendix C

Allegation or concern raised about a member of staff or adult

Does it meet the harm threshold? The harm threshold is met where it is alleged that an adult working (or volunteering) in the school has:

- *behaved in a way that has harmed a child, or may have harmed a child and/or*
- *possibly committed a criminal offence against or related to a child and/or*
- *behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or*
- *behaved or may have behaved in a way that indicates they may not be suitable to work with children (see KCSIE Part 4)*

You may wish to consider the questions in Box A below to help you decide the answer to this question.

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Contact CCC LADO on 01223 727967 or via LADO@cambridgeshire.gov.uk

This is a Low Level Concern. Consider carefully what action to take in response, taking advice from your HR Provider as appropriate. Keep a record in a secure central file. An example form for this purpose is available for use if required.

The LADO will ask for specific information about the issue and confirm whether or not it meets the harm threshold. If it does they will begin a formal process to manage the allegation. If it doesn't meet the threshold then they will record the information and advise you to treat the issue as a Low Level Concern. You will need to inform the staff member that LADO hold information on them.

If you need **further advice** on any aspect of this then please contact either:
Phil Nash on 07920 270820 or Sara Rogers on 07990 936820

Box A:

- How long has the adult or member of staff worked for you?
- Have there been any previous concerns raised?
- Is this a one-off or part of a pattern of behaviour?
- Has the member of staff previously been given advice in this area?
- Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)
- Might this have been a planned action or event?
- Could this behaviour be inadvertent? What is the likelihood of this?
- Could this be the precursor to more concerning behaviour?
- Did it occur in a 'public' or 'private' place? Was this in school or out of school?
- If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
- If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?

