



CAMBRIDGE  
SCHOOL OF  
VISUAL &  
PERFORMING  
ARTS

# SAFEGUARDING AND CHILD PROTECTION POLICY

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Date of Policy	September 2024
Approved by Board of Governors	November 2024
Next Review Date	August 2025
Lead for Review	DSLs, Principal, Rector, Designated Governor for Safeguarding and Child Protection

This policy and related procedures are in line with statutory requirements and based on 'Keeping Children Safe in Education' (KCSIE) 2024. Cambridge Arts and Sciences Ltd (CATS Cambridge and CSVPA) (CASL) child protection procedures are in accordance with government guidance and refer to locally agreed multi-agency safeguarding arrangements put in place by the three safeguarding partners. It will be updated annually (as a minimum) and be available publicly either via the school website, school intranet or in paper version.

### **UPDATED CONTENT FOR ACADEMIC YEAR: 2024-2025**

The core content for 2024-2025 has been updated to reflect key requirements and principles outlined in KCSIE 2024. There have been some amendments and additional content has been included in line with KCSIE 2024. This policy applies to all CASL students. Therefore, the term "child" is understood as applying to all our "young people", regardless of their age or Programme of Study.

## KEY CONTACTS

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Craig Wilson, Designated Governor for Safeguarding	Tel: +44 (0)7860 407 641
Robert Niu, Chair of Governors	rniu@catsglobalschools.com

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

Education Safeguarding Team	ecps.general@cambridgeshire.gov.uk
Education Safeguarding Manager	sara.rogers@cambridgeshire.gov.uk
Early Help Hub (EHH) – Targeted Support Service	Tel: +44 (0)1480 376 666
Customer Service Centre (Social Care referrals)	Tel: +44 (0)345 045 5203
Emergency Duty Team (Out of hours)	Tel: +44 (0)1733 234 724
Police Child Abuse Investigation Unit	Tel: 101
Local Authority Designated Officer (LADO)	Tel: +44 (0)1223 727 967 LADO@cambridgeshire.gov.uk
Senior Leadership Adviser – Phil Nash	Tel: +44 (0)7920 270820
Prevent Officers	Tel: +44 (0)1480 422 277 prevent@cams.police.uk

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## Introduction

Cambridge Arts and Sciences, consisting of CATS Cambridge and CSVPA (the Schools), fully recognise the responsibility it has to ensure that arrangements are in place to safeguard and promote the welfare of children. This responsibility is set out under Section 175 of the Education Act 2002, and the Education and Training (Welfare of Children) Act, 2021

The Schools are committed to safeguarding and promoting the welfare of all students. All actions and decisions will be determined by what is considered to be in the best interests of the child. We expect all staff, volunteers, visitors and students to share this commitment. This policy is consistent with the procedures of the Cambridgeshire and Peterborough Safeguarding Children Partnership Board.

This policy applies to all staff, paid and unpaid, working in the Schools including governors and administrative staff, as well as teachers. Anybody in these roles can be the first point of disclosure for a student. Concerned parents/guardians may also contact the Schools and their governors.

This responsibility is more fully explained in the statutory guidance for schools and colleges, “Keeping Children Safe in Education” (KCSIE, September 2024). Within this guidance is a specific requirement that all staff must be made aware of their duties and responsibilities as they are defined in Part One of KCSIE. These responsibilities are set out below: (set out below).

All staff who work directly with children must read:

- Part One of ‘Keeping Children Safe in Education, September 2024’,
- together with ‘Annex B’,
- and ‘What to do if you’re worried a child is being abused: Advice for practitioners’ (March 2015).

Where English is a second language, translated versions of KCSIE 2024 will be provided where available.

This guidance in KCSIE 2024 must be applied to all students enrolled in the Schools.

The guidance is clear that staff at the Schools 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 student tells them he/she is being abused or neglected
- Follow the referral process if they have a concern

This policy also sets out how the Schools’ governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of all their students.

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 school protective ethos at both Schools.
- **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 VULNERABLE CHILDREN:** those who may have been abused or witnessed violence towards others.
- **PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN:** Processes are followed to ensure that those who are unsuitable to work with children are not employed. (All procedures for Safer Recruitment are outlined in the CATS Global Schools Recruitment, Selection and Employment policy).

## Prevention

We recognise that high self-esteem, confidence, supportive friends, and good lines of communication with trusted adults, help to protect our students.

### **The Schools will therefore:**

- Establish and maintain an environment where our students feel safe in both the real and the virtual world, and in which they are encouraged to talk and listened to
- Ensure students know that there are trusted adults in their School whom they can approach if they are worried or in difficulty, and that their concerns will be taken seriously and appropriately acted upon..
- Ensure that students are aware of their right to speak with external support agencies, such as the Schools' Independent Listener and/or the Children's Commissioner, and that signs are posted in the Boarding House that publicise the contact details of the Schools' Independent Listener and/or the Children's Commissioner.
- Tailor their curriculums to be age and stage of development appropriate so that they meet the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- Incorporate into their curriculums, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice, and equality.
- Ensure that all school/School staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Anti Bullying Policy'.
- Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:

- How to: determine whether other children, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed
- The characteristics of positive and healthy friendships
- That some types of behaviour within relationships are criminal, including violent behaviour and coercive control
- What constitutes sexual harassment and sexual violence and why these are always unacceptable
- About online risks, including that any material someone provides has the potential to be shared online and the difficulty potentially compromising material removed once it has been placed online
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically explicit material, e.g., pornography, presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including prison
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships.
- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).

We use the Safer Corridors Toolkit, developed by the PHSE Service, which supports schools and Schools in preventing and reducing sexual violence and harassment and responding to incidents.

## Procedures

We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi-Agency Procedures'. A copy of these procedures can be found on their website:

<https://www.safeguardingcambspeterborough.org.uk/childrenboard/professionals/procedures/>

The Designated Safeguarding Lead (DSL) for CATS Cambridge is Blake Feig (Head of Welfare)  
The Designated Safeguarding Lead (DSL) for CSVPA is Thomas Marty (Head of Welfare)



### **The Deputy Designated Safeguarding Leads for CATS Cambridge are:**

Rebecca Baker Milne: Assistant Principal (Pastoral Care and Personal Development)

James Todd: Head of Boarding CATS Cambridge & CSVPA

### **The Deputy Designated Safeguarding Leads for CSVPA are:**

Elizabeth Nantais – Dean of Student Experience, CSVPA

Deacan Robinson – Head of Boarding and Residential Life

### **The nominated governor for Safeguarding and Child Protection is:**

Craig Wilson: Managing Director Schools

Other roles:

- Chair of Governors:
- The Chair of Governors for Cambridge Arts and Sciences is Robert Niu
- Heads of School:
  - CATS Cambridge, the principal of CATS Cambridge is Hugh McCormick
  - CSVPA, the rector of CSVPA is Karin Askham

## **Responsibilities of the Governing Body**

The governing body will ensure that the Schools:

- Appoint a senior member of staff, from the leadership team to the role of Designated Safeguarding Lead (DSL).
- Ensure the DSL is fully aware of and understand their responsibilities as outlined here and in the Annex C of KCSIE (September 2024), and that they have the capacity and capability to take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and should not be delegated. When the DSL is absent an appropriately qualified acting DSL must be appointed for the duration of the absence.
- Ensure that the role of DSL and DDSL is explicit in the role holder’s job description.
- Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See KCSIE, 2024, Annex C). Ensure that the DSL and deputies have undertaken the two-day training provided by the Cambridgeshire Education Safeguarding Team and that this training is updated at least every two years.

- Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g., via updates, meetings or additional training at least annually.
- 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 concerns from the point of induction. Staff members are required to log concerns via the electronic system and submit it to the DSL/DDSL immediately.
- Ensure that the Designated Safeguarding Lead (or a deputy) is always available for staff to discuss any safeguarding concerns. During weekday evenings and overnight the DSL is on call. At weekends there is a DSL trained Designated Person (DP) on call rota known to the Boarding Team.
- Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and the Police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2023.
- Ensure every member of staff and every governor knows:
  - the name of the Designated Safeguarding Lead/Deputies and their role;
  - how to identify the signs of abuse, neglect and exploitation, understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online
  - that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful;
  - how to pass on and record concerns about a student;
  - that they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation; and for referring safeguarding concerns to the DSL/DDSL;
  - what is meant by, and the importance of, showing professional curiosity;
  - that they have a responsibility to provide a safe environment in which children can learn;
  - where to find the Multi–Agency Procedures on the Safeguarding Children Partnership Board website;
  - their role in the early help/targeted support process;
  - the process for making referrals to children’s social care;
  - the safeguarding response to children who go missing in education, particularly on repeat occasions and/or prolonged periods.
  - the role of filtering and monitoring and the process for reporting issues
- Ensure all staff receive appropriate 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 and monitoring, at induction. The training should be regularly updated, as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

- Ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice regarding children, and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies, including low level concerns and allegations against staff.
- Ensure that parents are informed of the responsibility placed on the school and staff in relation to child protection by setting out these duties in the school. This can be found on our website.
- Ensure that this policy is available publicly via the school website: <https://www.catscambridge.com/policies/>
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and School leadership staff.
- Where students are educated off site or in alternative provision, the school and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the school.

## **Governing Body Child Protection responsibilities**

Governing bodies should ensure they facilitate a whole school/School 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.

The governing body fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in school are effective and comply with the law and government guidance at all times.

It will:

- Nominate a governor for safeguarding who has undertaken appropriate training and will take leadership responsibility for the school's safeguarding arrangements and practice and champion safeguarding issues.
- Ensure that all governors and trustees receive appropriate governor safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and Schools are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated.

- Ensure governors and trustees are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.
- Ensure an annual safeguarding report Annual Safeguarding Monitoring Report for Governors is made to the full governing body and copied to the Education Safeguarding Team. The governing body must then ensure that any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated, and understood and followed by all staff.
- It will be published on the school website.
- Ensure that children’s exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems and ensure the effectiveness is regularly reviewed.
- Ensure children’s wishes and feelings are considered where there are safeguarding concerns.

### **Extra-curriculum activities (on or off the schools’ sites)**

Both Schools provide boarding facilities and extra curriculum activities directly under the supervision or management of the Schools’ staff, the Schools’ arrangements for Safeguarding as written in this policy shall apply.

Where services or activities are provided separately by another organisation or individual, either on or off the Schools’ sites, 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 school on these matters where appropriate.

The governing body will use the guidance on After-school clubs, community activities and tuition: safeguarding guidance for providers (Sep 2023) which details the safeguarding arrangements that schools and Schools should expect these providers to have in place.

The governing body or proprietor 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.

### **Multi-Agency Working**

The Schools will:

- Work to develop effective links with relevant services to promote the safety and welfare of all students.
- Co-operate as required, in line with Working Together to Safeguard Children (2023), with key agencies in their enquiries regarding Child Protection matters including

attendance and providing written reports at Child Protection conferences and core groups.

- Notify the relevant Social Care Team 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 for a student who is subject to a Child Protection Plan

When a student who is subject to a Child Protection Plan leaves, information will be transferred to the new school immediately. The Child Protection Chair and Social Care Team will also be informed.

## **Record Keeping**

The Schools will:

- 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.
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. It is good practice to keep concerns and referrals in a separate safeguarding file for each child.
- Records should 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
- Electronic records are stored on the student's record on the Schools student information management platform, Shackleton, and when appropriate in a Welfare folder on the Schools' secure server. In addition, appropriate secure storage arrangements are in place for any historic hardcopy safeguarding files.
- Ensure all relevant safeguarding records are sent to the receiving school or establishment when a student moves, within five days, in accordance with 'Keeping Children Safe in Education, 2024, (page 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 school/School in advance of a child leaving.
- Make parents/guardians aware that such records exist except where to do so would place the student at risk of harm.

- Ensure all actions and decisions will be determined by what is considered to be in the best interests of the child and rationales are included for all discussions and decisions made.

## **Confidentiality And Information Sharing**

Information about children 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.

Child protection information will be stored and handled in line with the principles described in the UK GDPR and the Data Protection Act 2018. The UK GDPR and the Data Protection Act does not prevent the Schools’ staff from sharing information with relevant agencies, where that information may help to protect a student.

The Designated Safeguarding Lead may take advice from the Data Protection Officer (DPO) before a decision is made about what information to share. This decision will consider the balance between the potential risk to the child and the principle of working openly and honestly with parents.

In cases where the ‘serious harm test’ is met, in so far as serious harm will arise from sharing information with any of the likely recipients of the data being shared, the Schools understand they must withhold providing data in compliance with schools’ obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt the School/s will seek independent legal advice.

For more information on how we handle personal information please read our privacy notice <https://catsglobalschools.com/info/privacy-notice/>

The Schools will:

Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the Designated Safeguarding Lead or Social Care as required.

Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children (as set out in “Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers”, DfE May 2024)

Ensure staff are clear with children that they cannot promise to keep secrets.

Ensure that the Designated Safeguarding Lead will only disclose any 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.

Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent where to

do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of a crime.

Ensure that if a member of staff receives a Subject Access Request (under the UKGDPR and the Data Protection Act 2018) from a student or parent that they will refer the request to the DSL or Principal/Rector, who will coordinate the request with the Data Protection Officer (DPO)

## **Communication with Parents/Guardians**

The Schools will:

- Ensure that parents/guardians are informed of the responsibility placed on the School/s and staff in relation to Child Protection by setting out its duties in the Schools' prospectus/website.
- Undertake appropriate discussion with parents/guardians prior to involvement of another agency unless the circumstances preclude this action.
- Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, for example if the School believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of a crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

## **Child-On-Child Abuse**

We recognise that child-on-child abuse can manifest itself in many ways. These can include but are 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-nudes 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 (as defined in 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.

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

The Schools will therefore:

- Create a protective ethos across both Schools in which child-on-child abuse, including sexual violence and sexual harassment will not be tolerated.
- Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys the perpetrators.

- 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'.
- Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse.
- Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.
- The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's Child Sexual Behaviour Assessment Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board ([safeguardingcambspeterborough.org.uk](http://safeguardingcambspeterborough.org.uk)) if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.
- Ensure that staff should be aware that some groups are potentially more at risk; evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.



## Dealing with Sexual Violence and Sexual Harassment between students

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Ultimately, any decisions will need to be made on a case-by-case basis, with the DSL (or deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

Sexual violence and sexual harassment can occur between two children of any age and gender, from primary to secondary stage and into further education. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can occur through a group of children sexually assaulting or sexually harassing a single child or other group of children.

Children 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 school. 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 Schools will:

- Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- Make decisions on a case-by-case basis.
- Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when making decisions.
- 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.
- Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- Liaise closely with external agencies, including police and social care, when required.
- 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)

## Supporting Vulnerable Students

We recognise that any student may be subject to abuse 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.

We recognise that abuse or witnessing violence may have an adverse impact on students which may last into adulthood without appropriate intervention and support.

The Schools may be the only stable, secure and predictable element in the lives of student at risk. Nevertheless, when at the Schools, their behaviour may be challenging and defiant or they may become withdrawn.

We recognise that some vulnerable students may develop abusive behaviours and that these students may need to be referred on for appropriate support and intervention.

The Schools will support vulnerable students through:

- Curricular opportunities to encourage self-esteem and self-motivation.
- An ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- The Schools' behaviour policy will support vulnerable students in the Schools. All staff will agree on a consistent approach, which focuses on the behaviour of the student but does not damage the student's sense of self-worth. The Schools will ensure that the student knows that some behaviour is unacceptable, but s/he is valued and not to be blamed for any abuse which has occurred.
- Ensuring that advice is sought from the Senior Mental Health Lead where safeguarding concerns are linked to mental health in school/School.
- Liaison 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.
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- A commitment to develop productive and supportive relationships with parents/guardians.
- Recognition that students living in a home environment where there is domestic abuse, drug or alcohol abuse or mental health issues, are vulnerable and in need of support and protection; they may also be young carers.
- Monitoring and supporting students' welfare, keeping records and notifying Social Care in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures'
- When a student is missing from education, the Schools will follow the procedure as set out in Cambridgeshire's Children Missing Education guidance and inform the District Education Welfare Officer and Social Care if a student is subject to a Child Protection Plan or there have been ongoing concerns
- Recognition 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. Staff are required to be particularly alert to the potential need for early help for children in particular

circumstances. Please see page 10 of, 'Keeping Children Safe in Education, 2024', for the complete list.

## **Practicalities regarding disclosures**

You should always ensure that the time and place is appropriate to allow students to make a disclosure, if it is not, you should reassure the student that you understand they need to discuss something very important and that it warrants time, space, and privacy. You should make time to meet before the end of the school day.

In accordance with the Safeguarding Policy and Staff Acceptable use Policy, only work mobiles and email accounts should be used for any communication with students.

You should make clear at the beginning of the conversation or communication that there are limits to confidentiality. You should generally inform the student when a confidence has to be broken, but in some circumstances, you may speak to the DSL/Deputy DSL without informing the student.

You should not use leading questions when receiving a disclosure from a student. You should ensure that you take effective, verbatim notes, this will help to avoid asking the student having to repeat distressing matters to several people.

You must report any disclosures by students or parents involving the health or wellbeing of the student to the DSL as soon as possible after the disclosure.

Any staff member may make a direct referral to Cambridgeshire Children's Social Care via its Customer Service Centre telephone number: 0345 045 5203

Such referrals might include but are not restricted to the following examples:

- Any form of abuse (physical, sexual, emotional or neglect)
- Substance misuse or risk-taking behaviour
- Medical concerns (including mental health, such as indications of self-harm)

Such disclosures to the DSL must be made in an appropriate setting; one in which others cannot overhear. Where appropriate disclosures can be documented via a Welfare Concern note, using private notes on Shackleton.

Whenever appropriate, students should be encouraged to confide in their parents/legal guardian.

Never be worried about documenting disclosures which you think are too low level to be of concern, they may be a crucial piece of information to complete the picture for the DSL.

The DSL will decide what, if any, further action needs to be taken, both to ensure the student gets the help and support they need, and that the member of staff also gets the support and supervision they need.

### **Preventing unsuitable people from working with children**

The Schools will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to the government guidance 'Keeping Children Safe in Education' (2024) and the School's Recruitment Selection & Employment Policy

The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The following members of staff have undertaken Safer Recruitment training:

- Hugh McCormick – Principal
- Karin Askham – Rector
- Rebecca Baker-Milne – Assistant Principal (DDSL)
- Martin Blake - Assistant Principal
- Qadeer Afzal – Assistant Principal
- Jim Todd – Head of Boarding (DDSL)
- Weronika Halabis – Deputy Head of Boarding
- Angel Luis Rodriguez Padilla – Deputy Head of Boarding
- Blake Feig – Head of Welfare
- Eric Boston – Head of Humanities and Modern Foreign Languages
- Neelam Debata – Head of Science
- Deacan Robinson – Head of Boarding and Residential Life
- Megan Knight – Associate Dean of Academic Development and Enhancement

### **Allegations that may meet the Harms Threshold**

Where the Schools identify a child has been harmed, or that there may be an immediate risk of harm to a child or if the situation is an emergency, they should immediately contact Children's Social Care and, where appropriate, the police.

Any allegation of abuse made against teachers (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/Rector.

In cases where the Principal/Rector is the subject of an allegation, it will be reported to the Chair of Governors.

The Schools will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2024.

The Schools will consult with the Local Authority Designated Officer (LADO) 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', 2024 and the Company (CATS Global Schools) P&E Policies, seeking advice from the Schools' P&E partner as needed.

The Principal/Rector or Chair of Governors will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.

Before contacting the LADO, the Schools 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. The Schools will use the guidance chart found at Appendix D to support their decision-making.

The Schools will consider:

- Looking after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for 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.

CATS Cambridge & CSVPA will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 158 of KCSIE and the TRA's, 'Teacher misconduct advice for making a referral'. The Schools will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to Child Protection matters are concluded in full, even when the member of staff, supply 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.

Staff (including supply staff and volunteers) who are the subject of a concern/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 because it is considered that the person may pose a risk of harm to students. If a member of boarding staff is suspended pending an investigation of a child protection nature, the member of staff will not be permitted to stay in school accommodation which puts them in contact with children.

## **Concerns that do not meet the Harms Threshold**

Low level concerns that do not meet the harms threshold should be reported to the Principal/Rector. 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.

At CATS Cambridge –

As with all concerns, it is important that low level concerns are shared responsibly and with the right person, recorded and dealt with appropriately. Whilst the Headmaster will be the ultimate decision maker in respect of all low-level concerns about a member of staff, they can be reported confidentially to the DSL, Deputy Head Staff or Headmaster, who have shared oversight.

Where the concern is about the DSL or member of the Deputy head staff it should be reported to the Headmaster.

At CSVPA –

In cases where the Principal/Rector is the subject of an allegation, it will be reported to the Chair of Governors. The Schools will follow the procedures set out in Part Four, Section Two of ‘Keeping Children Safe in Education’, 2024.

The Schools will deal with any such concern, no matter how small, where an adult working in or on behalf of the school or School 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.

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 is reasonably possible.

Schools and Colleges can decide where these records are kept, but they must be kept confidential, held securely, and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Details of the allegation and outcomes are kept on the employee’s file.

The Schools will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the schools or (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. This will enable the schools/ to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school/School are clear

about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

The Schools 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/guardians as advised within the code of conduct 'Staff Guidance for Safer Working Practice' (Appendix C). As part of the Induction process, all staff, including supply staff, volunteers, and contractors, will 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. Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- All staff have been made aware of the contents of the code of conduct 'Staff Guidance for Safer Working Practice' (Appendix C).
- All staff, supply 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 Trust).

The Schools will ensure that communications between students and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny.

### **Other Related Policies**

- Anti-Bullying Policy
- Staff Acceptable Use Policy
- Health and Safety Policy
- E-Safety and Acceptable Use Policy
- Whistleblowing Policy
- Complaints Policy
- Student Behaviour Policy
- Staff Guidance for Safer Working Practice (Appendix C)
- Medical Care Policy
- Missing Student Policy
- Confidentiality Policy
- Misuse of Non-Prescribed Drugs Policy
- Equality and Diversity Policy
- Pastoral Principals and Welfare Policy
- Use of Reasonable Force Policy
- Recruitment Selection & Employment Policy
- Mental Health & Wellbeing Policy
- Search and Confiscation Policy





# APPENDIX A:

## Categories Of Abuse, Neglect And Exploitation

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**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. 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 by another child or children.

**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 children 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 children 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:
  - children in looking at, or in the production of, sexual images,
  - children in watching sexual activities
  - or encouraging children to behave in sexually inappropriate ways
  - grooming a child in preparation for abuse (including via the internet).

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

## Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, unexplainable and/or persistent absences from education, and sexting (also known as youth produced sexual imagery) put children in danger.

### Online-safety

We recognise that the online environment and mobile technology presents positive opportunities, but also significant risks. As such emerging technologies will be examined for educational benefit and a risk assessment will be carried out by CATS Global Schools (CGS) IT.

To mitigate risks the following arrangements are in place:

#### *With respect to staff and students:*

- The Schools have WiFi within the teaching spaces and the boarding houses which has the FortiGuard Security filtering system installed.
- The Schools will take all reasonable precautions to ensure that users access only appropriate material.
- However, due to the global and connected nature of Internet content, it is not possible to guarantee that access to unsuitable material will never occur via a School access or if via 3G, 4G or 5G services – vigilance, education and awareness are the key to mitigating the risks.
- CGS' IT Team will audit internet use to establish if online-safety measures are adequate and that the implementation of the online-safety measures are appropriate
- All students and staff are made aware that the use of computer systems without permission or for inappropriate purposes could constitute a criminal offence under the Computer Misuse Act 1990

#### *With respect to staff:*

- Staff will be issued with a School phone where contact with students is required. It is not permitted for staff to use their personal mobile phone, email or any online social media accounts to communicate with students
- Advice for staff is also included in the code of conduct 'Staff Guidance for Safer Working Practice' (Appendix C) Our policy on use of mobile phones, cameras and sharing of images is set out in the code of conduct 'Staff Guidance for Safer Working Practice' (Appendix C) and is reviewed annually.
- It is recognised that personal mobile phones have the potential to be used inappropriately and therefore the School has developed a policy to outline the required protocol for all staff, students, volunteers and parents/guardians.

### *With respect to students:*

- Mobile phones should only be used in lessons, as part of the teacher's chosen approach during lesson time. The sending of abusive or inappropriate text, picture or video messages is forbidden
- WiFi access in the Boarding Houses enables students to contact home via the internet on a regular basis, but is not available overnight to allow students ample time for rest and to aid them in their sleep time management
- The Schools recognise that as a multi-cultural community we must be sensitive to Internet related issues experienced by students outside the School environment e.g., on social networking sites. We provide education to our students about how to keep themselves safe, including on-line and when accessing remote learning

### *Cyberbullying*

It is essential that students, School staff and parents and carers understand how cyberbullying is different from other forms of bullying, how it can affect people and how to respond and combat misuse of the virtual environment. Promoting a culture of confident users will support innovation and safety.

Cyberbullying (along with all forms of bullying) will not be tolerated in School. Full details are set out in the School's on Anti-bullying Policy. There is welfare support available to any students who have been affected by Cyberbullying.

### *Sexting*

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

- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it's shared between children of the same age
- possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created

The Schools will address any issues with sexting or risky online behaviour guidance and all incidents of concerning online behaviour will be recorded.

## **Children showing signs of Abuse and/or Neglect and/or Exploitation**

The Schools recognise that, without appropriate intervention and support, children experiencing abuse or neglect may adverse effects which may last into adulthood. The Schools may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect or exploitation 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.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or School and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) 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 exploitation, criminal exploitation, and serious youth violence.

The School/s 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.

### **Students with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs)**

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties, and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

The Schools may have students with emotional and behavioural difficulties and/or challenging behaviours. The Schools will support staff to decide appropriate strategies that will reduce anxiety for the individual student and raise self-esteem as part of an overall behaviour support plan agreed with parents/guardians.

The Schools may have students who have communication difficulties, and they are aware that they are vulnerable to abuse and may be disproportionately impacted by behaviours such as bullying because they are unable to express themselves to others. Instead, such students will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the student.

Staff must not assume that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration.

Staff should recognise that these students are more vulnerable to peer-on-peer abuse than other students.

Under the Equality Act, there is also a duty to make reasonable adjustments for disabled children and young people.

We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

## **Young Carers**

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

The Schools 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.

## **Children at Risk of Criminal Exploitation**

Criminal exploitation of children is a form of harm 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.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. These are referred to as Extra-Familial Harms/Contextual Safeguarding and/or Risks Outside the Home.

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.

The Designated Safeguarding Lead will complete Safeguarding Children Partnership Board's Contextual Risk Screening Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board ([safeguardingcambspeterborough.org.uk](http://safeguardingcambspeterborough.org.uk)) and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

The Schools recognise 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 appropriate response to children and young people who go missing, particularly on repeat occasions.

## **Children at Risk of Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual

activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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.

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.

The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Contextual Risk Screening Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board ([safeguardingcambspeterborough.org.uk](http://safeguardingcambspeterborough.org.uk)) and refer to Social Care if there is a concern that a young person may be at risk of CSE.

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

The Schools are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. Cambridgeshire's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

## **Children Frequently Absent From Education**

The Schools recognise that children who have unexplainable and/or persistent absences from education, particularly those who go missing repeatedly is a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The Schools monitors and follows up on the attendance of individual students closely, as outlined in the Attendance Policy, and analyse patterns of absence to aid early identification of concerning patterns of absence.

The Schools endeavour to hold more than one emergency contact for each student to provide additional options to make contact with a responsible adult when a child who is absent from education is identified as a welfare and/or safeguarding concern.

When a child is absent from education, the Schools follow the procedure as set out in Cambridgeshire's Children Missing Education guidance. The Schools will inform Social Care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

The Schools will notify the local authority when they remove from or add a student's name to the admissions register at non-standard transitions, i.e., where a compulsory school-aged child leaves before completing year 11 or joins after the beginning of year 10.

## **Children Living with Domestic Abuse**

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

The Domestic Abuse Act 2021 applies to those aged 16 or over 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.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

The Schools recognise that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence 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.

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.



The Schools are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to students who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

In order to achieve this, Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents to which Police have been called, where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead.

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing and resulting actions will be undertaken in accordance with the, 'Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Schools and Early Years settings'.

### **Children at risk of 'Honour- Based' Abuse (HBA) including Female Genital Mutilation (FGM)**

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.'

The Schools take these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

The 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 Schools will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is over 18, will be

dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the student's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

### **Children who have returned home to their family from care**

The Schools recognise that a previously looked after child potentially remains vulnerable. The Schools 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 Multi-Agency Procedures.'

### **Children at Risk of Radicalisation**

The Schools recognise that children are susceptible to extremist ideology and radicalisation, similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or Schools' safeguarding approach.

The governing body will ensure that a DSL has undertaken Prevent Lead training (which is updated every two years) and that all staff receive training about the Prevent duty.

The following members of staff are the Prevent Leads and have undertaken Prevent Lead training:

- Blake Feig – DSL, CATS Cambridge
- Thomas Marty – DSL, CSVPA

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. Each of the Schools' designated safeguarding leads (and any 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).

## **Children Misusing Drugs or Alcohol**

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the school will consider such action in the following situations:

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

## **Children who have Family Members in Prison**

The Schools are 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.

The Schools recognise that children with family members in prison are at risk of poor outcomes including, poverty, stigma, isolation, poor mental health and poor attendance.

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

The School/s will work with the family specialist organisations, and the child to minimise the risk of the child not achieving their full potential.

## **Privately Fostered Children**

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.

The Schools will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Fostering Recruitment and Assessment Team.

## **Further Information**

In addition to the information above it is important that staff who work directly with students recall the further information found in KCSIE 2024 Annex B.

# APPENDIX B: CONTACT DETAILS

Blake Feig DSL (CATS Cambridge)	Tel: +44 (0)7773 971 651
Thomas Marty DSL (CSVPA)	Tel: +44 (0)7912 555 773
Hugh McCormick, Principal (CATS Cambridge)	hmcCormick@catscambridge.com
Karin Askham, Rector (CSVPA)	Tel: +44 (0)7850 518 010
Craig Wilson, Designated Governor for Safeguarding	Tel: +44 (0)7860 407 641
Robert Niu, Chair of Governors	rniu@catsglobalschools.com

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

Education Safeguarding Team:	ecps.general@cambridgeshire.gov.uk
Education Safeguarding Manager:	sara.rogers@cambridgeshire.gov.uk
Early Help Hub (EHH) – Targeted Support Service	Tel: +44 (0)1480 376 666
Customer Service Centre (Social Care referrals)	Tel: +44 (0)345 045 5203
Emergency Duty Team (Out of hours)	Tel: +44 (0)1733 234 724
Police Child Abuse Investigation Unit	Tel: 101
Local Authority Designated Officer (LADO)	Tel: +44 (0)1223 727 967 LADO@cambridgeshire.gov.uk
Senior Leadership Adviser – Phil Nash	Tel: +44 (0)7920 270820
Prevent Officers	Tel: +44 (0)1480 422 277 prevent@cams.police.uk

## Relevant documents

“Keeping Children Safe in Education: Statutory guidance for schools and Schools” (September 2024)  
 “Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings” (April 2022)

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

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

“Meeting digital and technology standards in schools and Schools, Filtering and monitoring standards for schools and Schools” (May 2024)

“The Prevent duty: an introduction for those with safeguarding responsibilities - GOV.UK (www.gov.uk) (Jun 2023)

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

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 Schools,” (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)

# APPENDIX C: STAFF GUIDANCE FOR SAFER WORKING PRACTICE (CODE OF CONDUCT)

All staff will be encouraged to demonstrate exemplary behaviour in order to protect themselves from false allegations.

The following are common sense guidelines of how this can be achieved (they are not exhaustive):

- Never making sexually suggestive comments to students in jest or fun, nor engaging in rough, physical or sexually provocative games, including horseplay
- Never asking for personal information without providing an explanation of:
  - the reason making the request
  - how the information is going to be used and stored
  - and being clear confidentiality and privacy are not guaranteed.
- Doing things of a personal nature for a student that they can do for themselves
- If a student approaches you inappropriately, discourage them and ensure you implement safe working practices such as: you are never alone with them, informing your line manager immediately or as soon as possible. In addition, make a written record of what has happened, including dates and times; what you said to the student with whom you spoke, as soon as possible after the event; and also note what advice you were given.
- If you find yourself in the position of teaching one on one always notify your line manager or another member of staff of the situation. If you have to move location, then this also needs to be made known. Always leave the classroom door open and always make sure the student sits nearest the door. Where this is not possible, never obstruct exit pathway of the student by placing yourself between the exit and the student.
- If you have to speak to a student on a personal matter, it is always best practice to have another member of staff present. Where this is impossible, notify your immediate line manager prior to speaking to the student and where this is not feasible then do so as soon as you possibly can, remembering to record notes about the interaction.
- If you are teaching a subject which requires physical contact to support your teaching such as in music or sports, ensure that you have made the student aware that physical contact is required, i.e. "I am going to show you how to place your arm. Is it ok if I hold your arm?" You should never engage in physical contact without prior agreement with the student.
- It is not appropriate for staff to socialise with students without the School being aware, and it is not appropriate for staff to use chat rooms or other online forums other than those that have been set up by the School to communicate

with students Staff should always communicate within clearly defined boundaries. Staff should ensure that:

- Personal social networking sites are set at private and never listed as approved contacts
- They never use or access social networking sites of students
- They do not give their personal contact details to students, including their mobile telephone number or email address
- They only use equipment e.g., mobile phones, provided by school/service to communicate with students, making sure that parents have given permission for this form of communication to be used
- They only make contact with students for professional reasons and in accordance with any School policy
- They recognize that text messaging should only be used a part of an agreed protocol and when other forms of communication are not possible
- They do not use internet or web-based communication channels to send personal messages to a young person
- They may not register or post on the CATS Cambridge or CSVPA Facebook page without the express permission of the Principal or Rector. If permission is given, a new account must be created without any personal details or friends so that students may not access any personal information about you. Your School email should be used to sign up and not a personal one.
- Staff should not use personal mobiles to contact students at any time.
- As the University Foundation Programme has a shelf life of two years it is not considered appropriate for staff to have contact with former students for two years after they have left the School. Staff may however contact students or former students at any time using CATS School email.
- Staff should not use personal cameras to take pictures of students.
- Staff may not drive students in their own car unless they have business insurance and have logged all documents with the Operations/H & S Transport Manager. Staff may use company vehicles to transport students where this is required by other School policies and where they, the driving staff member(s), has signed the vehicle out from an authorised person who has confirmed that the driving staff member(s) has met the requirements stipulated in the company's employee handbook and the company's vehicle management policies. Company vehicles may include, from time to time, vehicles hired by the company. Where this is the case the hire vehicle will be brought onto the company's fleet for the purposes of insurance and may then be treated as any vehicle owned by the School. In all other circumstances, any student needing transportation must therefore be transported by our registered Taxi company whose drivers are all DBS checked.
- In terms of physical contact with students, always remember whether behaviour is situational appropriate - a hug initiated by the student at graduation in the presence of others would be viewed differently to a hug initiated by you alone in a classroom. Again, with any allegation, history of initiating contact is seen as a contributing factor.

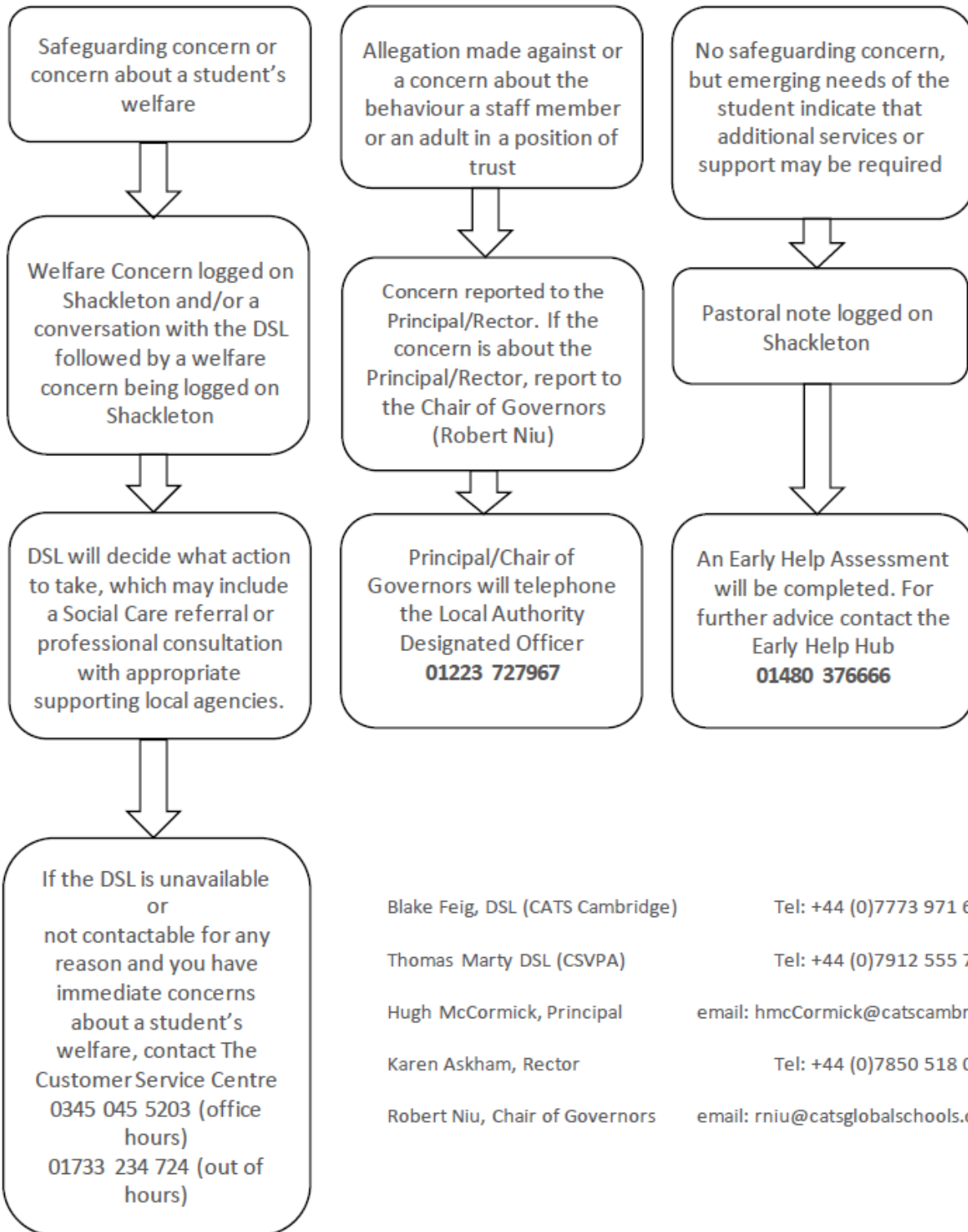
All staff must also be aware that it is an offence under section 16 of the Sexual Offences Act 2003 for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child is deemed to be a position of trust.

Any allegations arising from incidents happening when the school is being used by another organisation should be dealt with by the school under the CSCP Guidance for schools on dealing with allegations against staff and volunteers.

NB The above guidance should not be considered exhaustive and more detailed guidance can be found in “Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings” (February 2022). If staff feel further guidance is required for specific posts/activities, or they have any concerns regarding the appropriateness of any practice/action they should contact their line manager/senior manager/DSL.



# APPENDIX D: OVERALL PROCESS FLOWCHART



# APPENDIX E: DEALING WITH ALLEGATIONS OR CONCERNS ABOUT AN ADULT WORKING WITH CHILDREN (LOW-LEVEL CONCERNS)

## Principles

The Schools are committed to ensuring Low-Level Concerns are monitored, recorded and dealt with appropriately to create a safer culture for all staff, students and visitors. CATS Cambridge & CSVPA have a moral, legal, and social responsibility to provide a safe environment for students studying and residing with us.

## Scope and References

This policy sets out good practice and provides guidance on how to deal with situations and put in safeguards where a low-level concern may be encountered to ensure promotion of a safe culture and the prevention of possible harm. It will work in conjunction with all school policies and procedures, including, but not exclusive to, the following: Safeguarding Policy, GDPR, Health and Safety, Prevent Strategy and Safer Recruitment Policy.

## Distinction between an allegation and a Low-Level Concern

A culture encouraging the reporting of Low-Level Concerns enables staff to share any concerns they may have, no matter how small, about the behaviour of any adult in the school.

Concerns should not be limited to Safeguarding but could relate to behaviour which does not meet the professional standards expected within CGS.

The term 'allegation' means that it is alleged that a person who works with children has:

- 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;
- or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

An allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they have behaved in a way in their personal life that raises

safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon; have, as a parent or carer, become subject to child protection procedures; are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

A Low-Level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A Low-Level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which is not consistent with an organisation's 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 do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Principal.

### **Importance of sharing Low-Level Concerns**

It is necessary to ensure a culture of openness and trust is fostered within an organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner. It is well documented that organisational child sexual abuse is often preceded by grooming, and that such conduct was observed and considered questionable. This could be targeted at protective adults, not just children or vulnerable adults. This behaviour was rarely reported to the relevant individual in the organisation, was not recorded, and not available later for evaluation of patterns emerging. It is not possible for individuals to accurately judge people, as there is no one profile to describe everyone who abuses a child, so focus should be placed upon specific behaviours.

To minimise the risk of situational offending, there needs to be a culture of allowing the confidence to speak out. This requires a robust framework, policy, training, support and leadership to facilitate this and a willingness to accept that abuse could happen in any organisation.

### **Self-Reporting**

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct.

Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest

opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

In line with KCSIE, the Schools will ensure that there is an environment where staff are encouraged and feel confident to self-refer.

### **Implementation**

- To be effective, this policy must have 'buy in' from all staff, and leaders must be seen to adhere to and model the expected values and behaviours as written in the policy.
- Training on this policy will be incorporated in both the Safeguarding Induction Training for new staff and the Annual Safeguarding Training for all staff. Staff should contact the Principal, or in their absence the Chair of Governors, without informing the adult who is the subject of the reporting individual's concern.
- If the concern is about the Principal, it should be passed to the Chair of Governors without informing the Principal.
- In all cases, the initial contact should be followed up by e-mail where the concern was not conveyed in writing in the first instance.
- When a low-level concern has been raised by a third party, the Principal should collect as much evidence as is possible by speaking with the person who raised the concern, to the individual and to any witnesses.
- Any concerns or issues relating to the Low-Level Concern Policy will be included in the annual safeguarding report to governors.

### **Data Protection**

The Data Protection Act 2018 makes specific provision for the processing of personal data necessary for safeguarding children from harm. The Information Sharing Code of Practice (Information Commissioner's Office 2019) specifically cites safeguarding of children as a 'clear example of a compelling reason' to share personal data. Where a concern is low-level, rather than an allegation, the balance between safeguarding interest and personal data rights will be considered carefully to ensure it is a reasonably necessary measure that the data should be shared.

### **How Low-Level Concerns will be recorded**

Low Level Concern Forms and records will be retained (including those subsequently deemed to relate to behaviour which is entirely consistent with the Code of Conduct) in the school folder and log in the central P&E area on SharePoint. Where there are multiple low-level concerns relating to the same individual these will be kept in chronological order as a running record. These records will be kept confidential and held securely with only the Principal, P&E team having access. The log will contain details of the concern, the context in which it arose and action taken. The name of the person reporting should be noted respecting wishes to remain anonymous as far as reasonably possible.

Where concerns also involve issues of misconduct or where such issues have caused the poor performance; disciplinary, grievance or whistleblowing procedures to be triggered, the normal records required would still be made and kept according to procedure in addition to the low-level concerns records.

Where the low-level concern is serious enough to be referred to the LADO (or in the case of Local arrangements requiring all concerns to be reported to the LADO), the related records will be placed and retained on the staff member's employee file. Where a low-level concern is reclassified as an allegation, then the records relating to it will be treated accordingly.

### **Review of the central Low-Level Concerns file**

The Safeguarding Governor will review the school Low Level Concerns File termly. A record of these reviews will be made. This is to ensure such concerns are being dealt with promptly and appropriately and that any potential patterns of concerning, problematic or inappropriate behaviour are identified, a course of action can be decided and carried out. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. It will also be considered whether there are any wider cultural issues in school that enabled the behaviour to occur. If appropriate policies would be revised or extra training delivered to minimise the risk of recurrence. The rationale for all decisions and actions taken will be recorded.

### **Retention of Low-Level Concern records**

There is currently no guidance on the retention of Low-Level Concerns, but the point at which an employee leaves the organisation would be considered a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

### **Should Low-Level Concerns be referred to in a reference?**

With reference to KCSIE guidance, allegations which are proven to be false, unsubstantiated or malicious, should not be included in employer references. Likewise, a history of repeated concerns which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. Misconduct or consistent poor performance, where relevant, may be included. This would not normally include Low-Level concerns of a safeguarding nature, unless the threshold is met for referral and found to be substantiated, where it should then be referred to in a reference. Where KCSIE does not apply, consideration must be given to legal obligations and duty of care in giving accurate references.

### **Role of the Board**

The DSL's will include in the Quarterly Reports to the Board, the information about the implementation of the Low-Level Concern Policy and any evidence as to its effectiveness, with any relevant data.