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**Table of Contents**

1. Introduction .....	2
2. School related policies .....	4
3. Prevention.....	5
4. Procedures .....	5
5. Role of School Staff and Governors .....	6
6. Training .....	7
7. Induction .....	7
8. Liaison with Other Agencies .....	7
9. Record Keeping .....	8
10. Confidentiality and Information Sharing .....	8
11. Communication with Parents/Carers .....	9
12. Supporting children .....	9
13. Young Carers .....	10
14. Children With Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs .....	10
15. Privately Fostered Children .....	10
16. Children Who Have Returned Home To Their Family From Care.....	10
17. Child-on Child Abuse.....	11
18. Sexual Violence and Sexual Harassment between children .....	11
19. Sharing of nudes and semi-nudes.....	12
20. Disclosure .....	12
21. Children Misusing Drugs or Alcohol.....	13
22. Children Living with Substance Misusing Parents/Carers .....	14
23. Children Living with Domestic Abuse .....	14
24. Children showing signs of Abuse, Neglect and/or Exploitation .....	15
25. Children at risk of 'Honour- Based' Abuse (HBA) including Female Genital Mutilation (FGM) .....	15
26. Children at Risk of Child Sexual Exploitation (CSE) .....	16
27. Children at risk of criminal exploitation .....	16
28. Children frequently absent from education .....	16
29. Non-standard transitions.....	17
29.1. Deleting a pupil from the school roll .....	17
29.2. Registering a new pupil .....	18
30. Children at Risk of Radicalisation.....	18
31. Preventing unsuitable people from working with children.....	19

32. Mental Health .....	19
33. Governing body safeguarding responsibilities .....	20
Appendix 1: Staff Procedures in the Event of a Concern .....	21
Appendix 2: DSL/DDSL Procedures in the event of a concern .....	23
Appendix 3: Categories of abuse, neglect and exploitation .....	24
Appendix 4: E-Safety.....	26
Appendix 5: The role of the Designated Safeguarding Lead (DSL) .....	31
Appendix 6: Procedures for Allegations of Abuse against members of the School Staff or Volunteers .....	34
Appendix 7: Relevant Documents .....	41
Appendix 8: Useful Contacts.....	42

## 1. Introduction

St Faith’s fully recognises the responsibility it has under Section 175 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014, to have arrangements in place to safeguard and promote the welfare of children. In order to safeguard children at St Faith’s, this work is undertaken using the following documents:

- ‘Keeping Children Safe in Education’ (September 2024). (All staff must be made aware of their duties and responsibilities under Part One of this document. Staff should read the above document together with ‘Annex B’ of ‘Keeping Children Safe in Education’, 2024).
- ‘Working Together to Safeguard Children’ (February 2024).
- ‘The Prevent Duty, Guidance for specified authorities in England and Wales (2023).

Further information and guidance we use is found in Appendix 7.

Safeguarding and promoting the welfare of children is everyone’s responsibility. ‘Children’ includes everyone under the age of 18. This responsibility is more fully explained in the statutory guidance for schools ‘Keeping Children Safe in Education’ (September 2024). All staff must be aware of their duties and responsibilities under Part One of this document. This should be read in conjunction with ‘Annex B’ of KCSIE if staff are working directly with children. The school can decide if it is appropriate for staff who do not work directly with children just to read ‘Annex A’.

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

- listen to children and identify concerns early to prevent them from escalating
- provide a safe environment in which children can learn
- identify children who may benefit from early help
- know what to do if a child tells them he/she is being abused, neglected or exploited
- follow the referral process if they have a concern

This policy sets out how the school’s governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the school. It is consistent with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board (SCPB) procedures. It is made available publicly on the St Faith’s website.

There are four main elements to our policy:

**PREVENTION** through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos.

**PROCEDURES** for identifying and referring cases, or suspected cases, of abuse or exploitation.

**SUPPORTING CHILDREN** particularly those who may have been abused or witnessed violence towards others.

**PREVENTING** unsuitable people working with children.

Our policy applies to all paid staff and volunteers working in the school, including governors. Teaching assistants, peripatetic music teachers and office staff as well as teachers can be the first point of disclosure for a child. Concerned parents or other adults may also contact the school and its governors.

Safeguarding arrangements at St Faith's are the responsibility of the Safeguarding Committee which meets at least once a term and at other times as required. Its members are:

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#### The School's Safeguarding Committee

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Dr Crispin Hyde-Dunn

Headmaster  
Safeguarding Meeting Chair

[chydedunn@stfaiths.co.uk](mailto:chydedunn@stfaiths.co.uk)



Mr Mike Critchley

Director of Pastoral Care  
Designated Safeguarding Lead (DSL)  
Prevent Lead  
E-Safety Coordinator

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Mrs Louise Wakefield

Head of Pre Prep  
Deputy Designated Safeguarding Lead (DDSL)  
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Ed Johnson

Head of Bentley House  
Deputy Designated Safeguarding Lead (DDSL)  
Domestic Violence Lead

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Mrs Jo Walker

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Mrs Caroline Hendry

Deputy Head of Pre Prep  
Deputy Designated Safeguarding Lead (DDSL)

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Mrs Wendy Challen

Governor with responsibility for safeguarding

The DSL and DDSLs have been trained under the two-day child protection training course, accredited by the Safeguarding Children Partnership Board and updated every two years. Mrs Wendy Challen has undertaken a one-day Governors' Training Course.

## 2. School related policies

The Safeguarding and Child Protection Policy should be read in conjunction with the following related policies are publicly, which are available on the School [website](#):

- Anti-Bullying Policy, reviewed annually
- Information Technology Acceptable Use Policy, reviewed annually
- RSE and Health Education Policy, reviewed annually
- Parental Complaints Policy, reviewed annually
- Pastoral, Behaviour and Discipline Policy, reviewed annually

The following policies are available in the School Policies Folder on the IT [network](#):

- a. Educational Visits Policy, reviewed annually
- b. Equal Opportunities Policy, reviewed biennially
- c. Mobile Phone and other Smart Devices Policy, reviewed annually
- d. Physical Contact and Positive Handling Policy, reviewed biennially.
- e. Recruitment and Selection Policy, reviewed annually.
- f. The Leys & St Faith's Schools' Foundation Whistleblowing Policy and Procedure, reviewed biennially.
- g. Social Media Policy
- h. Lone Working Policy

The following handbook is distributed to staff annually

- i. The St Faith's Staff Handbook, containing staff Code of Conduct, reviewed annually

### 3. Prevention

We recognise that high self-esteem, confidence, supportive friendships and good lines of communication with a trusted adult, help to protect children. The school will therefore:

- establish and maintain an environment where children feel safe, including in a digital context, where they can talk about their concerns and problems and be listened to;
- ensure children know that there are trusted adults in the school whom they can approach if they are worried or in difficulty, and their concerns will be taken seriously and acted upon as appropriate;
- tailor our curriculum appropriately so that it meets 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 the curriculum, activities and opportunities that provide children with the skills they need to stay safer from abuse and exploitation in all contexts and develop their understanding of stereotyping, prejudice and equality.
- ensure that all 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.

### 4. Procedures

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

The School will:

- appoint a senior member of staff, from the Senior Management Team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Leads, DDSLs), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.
- ensure that the role of DSL and DDSL is explicit in the role holder's job description (as outlined in Keeping Children Safe in Education, 2024 Annex C).
- 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 'Keeping Children Safe in Education, 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 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. (See Appendix 1 of this policy for details of these procedures).
- ensure that the DSL or a DDSL is available either in person or via a phone conversation (during school hours, during term-time) to discuss any safeguarding concerns.
- ensure that all staff are clear upon the course of action they must take if in exceptional circumstances a DSL/DDSLS is not available. (For contingency arrangements in the event that a DSL/DDSLS is not available see Appendix 1).
- liaise with the three safeguarding partners (Local Authority, Integrated Care Board and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children (February 2024).
- nominate a governor for safeguarding and child protection who has undertaken appropriate training.
- ensure all staff members undergo safeguarding and child protection training at induction.
- 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 in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed Whistleblowing Policy and Procedure and Appendix 6 of this policy.
- 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 Parent Handbook.
- ensure that this policy is available publicly on the school website.
- 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 the Senior Management Team.

## 5. Role of School Staff and Governors

The School will ensure that every member of staff and governor knows:

- the name of the Designated Safeguarding Lead/Deputy Designated Safeguarding Leads and their roles
- how to identify the signs of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online
- how to pass on and record concerns about a pupil
- 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
- 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/DDSLS
- 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 are absent from education, particularly on repeat occasions

and/or for prolonged periods

- the role of filtering and monitoring and the process for reporting issues

## 6. Training

Basic child protection training, led by Cambridgeshire Education Safeguarding Team, takes place every three years; in addition, the school provides regular in-house safeguarding and child protection training, so that all staff and volunteers from the point of their induction, have the skills to identify and report cases, or suspected cases, of abuse. This training is updated at least annually to ensure that staff are confident about:

- the school's statutory responsibility
- their personal responsibility
- the school's policies and procedures
- the need to be alert to the signs and indicators of possible abuse, including child sexual exploitation, female genital mutilation and radicalisation
- the need to record concerns
- how to support and respond to a child who tells of abuse

The staff are required to read these documents and agree to work to their guidance and standards:

- St Faith's School 'Safeguarding and Child Protection Policy'
- 'Keeping Children Safe in Education Part 1, including 'Annex B' (September 2024)
- The Safer Recruitment Consortium's 'Guidance for safer working practice for those working with children and young people in education settings' (February 2022)). This guidance is particularly important for safeguarding arrangements where teaching staff are involved in close one-to-one teaching e.g. in individual music teaching and sports coaching.

Teaching and support staff are Prevent trained and the DSL has taken a Prevent refresher awareness course.

The Director of Music and the Catering Manager have completed the two-day DSL training course so that they can lead basic child protection and safeguarding training sessions, induction training and regular safeguarding updates.

## 7. Induction

New staff attend Basic Safeguarding Training delivered by the DSL and complete online Prevent training. The induction pack which new staff are required to read and follow includes:

- 'KCSIE' Part 1, including 'Annex B' (September 2024)
- 'Guidance for safer working practice for those working with children and young people in education settings' (February 2022)
- St Faith's 'Safeguarding and Child Protection Policy'
- St Faith's 'Pastoral, Behaviour and Discipline Policy'
- The Leys & St Faith's Schools 'Foundation Whistleblowing Policy & Procedure'
- St Faith's 'Teaching Staff Handbook' (including the Code of Conduct, which contains guidance to staff on acceptable use of IT, staff/pupil relationships and communications, including use of social media).

The school will ensure that all paid staff and volunteers, recognise their duty and feel able to raise concerns about poor or unsafe adult practice in regard to children, and that such concerns are addressed sensitively and effectively in a timely manner in accordance with the

## 8. Liaison with Other Agencies

The school will:

- work to develop effective links with relevant services to promote the safety and welfare of all pupils;
- co-operate, as required in 'Working Together to Safeguard Children' (February 2024), 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:
  - the School should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
  - there is an unexplained absence of a pupil who is subject to a Child Protection Plan.
  - there is any change in circumstances to a pupil who is subject to a Child Protection Plan
- transfer information to the new school immediately if a pupil who is subject to a Child Protection Plan leaves. Ensure that the Child Protection Chair and Social Care Team are also informed.

## 9. Record Keeping

The school will:

- keep clear, detailed and accurate written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately.
- ensure that all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing.
- make sure that records 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 and/or other agencies
- ensure confidential, electronic records are stored on MyConcern, a purpose-built, secure platform. These will be audited at least termly.
- In addition, appropriate secure storage arrangements are in place for historic hardcopy safeguarding files.
- ensure all relevant child protection records are sent to the receiving school or establishment when a pupil moves schools, within five days, in accordance with 'Keeping Children Safe in Education' (September 2024). The DSL will consider whether it would be appropriate to share information with the new school/college in advance of a child leaving.
- make parents aware that such records exist except where to do so would place the child at risk of harm.
- ensure that all actions and decisions are led by what is considered to be in the best interests of the child and rationales are included for all discussions and decisions made.

## 10. 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.

The Data Protection Act 2018 does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The school will:

- ensure staff and volunteers adhere to confidentiality protocols and that information is shared



appropriately.

- 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 that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Headmaster.
- ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Deputy Designated Safeguarding Leads will:

- disclose information about a pupil 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 crime.
- record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' (February 2024)
- withhold providing the data in cases where the 'serious harm test' is met, in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt, independent legal advice should be sought.
- seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

## 11. Communication with Parents/Carers

The school will:

- ensure that parents/carers are informed of the responsibility placed on the school and staff in relation to child protection by setting out its duties in the Parents' Handbook and on the school website.
- undertake appropriate discussion with parents/carers prior to the involvement of another agency, unless the circumstances preclude this action.
- discuss with Children's Social Care 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 crime.
- Record in MyConcern any discussion that has taken place with parents, or if a decision has been made not to discuss the matter with parents. For example, if the school believes that notifying parents could place the child or another person at immediate risk of harm, or prevent the detection of a crime, the rationale must be recorded. Records may subsequently be disclosed to relevant partner agencies if Child Protection proceedings commence.

## 12. Supporting children

St Faith's recognises that any child may be subject to abuse and neglect and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. This will have an adverse impact on children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

The school will support all children by:

- promoting educational outcomes and sharing information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing/have experienced with teaching staff and SMT.
- liaising with the DSL/DDSLs where safeguarding concerns are linked to mental health in school, for advice on case management.
- providing curricular opportunities to encourage self-esteem and self-motivation.
- creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- applying the school's behaviour policy effectively and liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Emotional Health and Wellbeing Service, 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.
- recognising that 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. See page 10 of Keeping Children Safe in Education 2024 for the complete list. The list includes:

### **13. Young Carers**

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

St Faith's 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.

### **14. Children 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 school has some pupils with emotional and behavioural difficulties and/or challenging behaviours. The school will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem. Staff are required to be particularly alert to the potential need for early help for children with disabilities, additional needs or SEND. Under the Equality Act, there is a duty make reasonable adjustments for disabled children and young people.

### **15. 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 school will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Fostering Recruitment and Assessment Team.

### **16. Children Who Have Returned Home To Their Family From Care**

St Faith's recognises that a previously looked after child potentially remains vulnerable. School will vigilantly

monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi - Agency Procedures.'

## **17. Child-on Child Abuse**

Child-on-child abuse can manifest itself in many ways. It can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-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 (part of the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals.

A case of child-on-abuse would be considered to be a safeguarding matter where there is 'reasonable cause to suspect that a child is suffering or likely to suffer significant harm.'

All forms of child-on-child abuse are unacceptable and will be taken seriously. 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. The school will therefore:

- create a whole school protective ethos 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, 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 as 'banter' or 'having a laugh'.
- include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- provide Relationship and Sex Education (RSE) which includes teaching about consent.
- ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding reporting procedures.
- ensure that staff are 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. St Faith's will ensure that these children have a trusted adult in school to talk to.
- always consider the welfare of both the victim(s) and perpetrator(s) in these situations. See the Anti-Bullying & the Pastoral, Behaviour and Discipline Policy for further information on record keeping and sanction.
- Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.

## **18. Sexual Violence and Sexual Harassment between children**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. 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 group of children.

Children who are victims of sexual violence and sexual harassment will, in all likelihood, find the experience stressful and distressing. This may 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 school 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 decision making.
- 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.
- ensure the Designated Safeguarding Lead refers to the [Safeguarding Children Partnership Board's Child Sexual Behaviour Assessment Tool](#) if there is a concern that a young person may be displaying sexually harmful behaviours.
- liaise closely with external agencies, including police and social care, when required.
- refer to 'Keeping Children Safe in Education - Part Five' (September 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 (UKIS, February 2024)

## 19. Sharing of nudes and semi-nudes

This information should be used in conjunction with the Government guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (February 2024)

Sharing of nudes and semi-nudes involves the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. Professionals may also refer to nudes and semi-nudes as 'Youth produced sexual imagery', 'indecent imagery' or 'sexting'.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. It is an offence to possess, distribute, show and make indecent images of children. A child is classified as anyone under the age of 18.

All incidents involving sharing of nudes or semi-nudes should be responded to in line with the School's Safeguarding and Child Protection Policy.

If an incident involving sharing of nudes or semi-nudes comes to the School's attention:

- the incident should be referred to the DSL as soon as possible
- the DSL should hold an initial review meeting with appropriate school staff
- there should be subsequent interviews with the young people involved (if appropriate)
- parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- a referral should be made to children's social care and/or the police immediately if at any point in the process there is a concern a pupil has been harmed or is at risk of harm

## 20. Disclosure

Disclosures about sharing of nudes and semi-nudes can happen in a variety of ways. The pupil affected may inform a Tutor, the DSL, or any member of the School staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or inform the police directly.

Any direct disclosure by a young person must be taken very seriously. A young person who discloses that they are

the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort, and they may have already tried to resolve the issue themselves. In the event of a disclosure about sharing of nudes and semi-nudes, staff should speak to the DSL or a DDSL and complete a MyConcern entry.

The DSL/DDSL, should establish the following:

- whether there is an immediate risk to a young person or young people
- if a referral should be made to the police and/or children's social care
- if it is necessary to view the imagery in order to safeguard the young person – **in most cases, imagery should not be viewed**
- what further information is required to decide on the best response
- whether the imagery has been shared widely and via what services and/or platforms
- whether immediate action should be taken to delete or remove images from devices or online services
- any relevant facts about the young people involved which would influence risk assessment
- if there is a need to contact another school, college, setting or individual
- whether to contact parents or carers of the pupils involved - in most cases parents should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

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

If none of the above apply, then the DSL, with input from the Headmaster, may decide to respond to the incident without involving the police or children's social care. The decision should be in line with the school's safeguarding procedures and should be based on consideration of the best interests of the child/children involved. The decision should be reviewed throughout the process of responding to the incident.

The decision to respond to the incident without involving the police or children's social care would be made in cases where the DSL is confident that the school has enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework. A decision can always be made to escalate the incident at any time if further information is disclosed at a later date.

## 21. 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 pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- to suspect that the misuse is linked to parent/carer substance misuse;

- indicate that the misuse is causing an urgent health or safeguarding concern;
- to believe that the child is at risk of harm through any substance associated criminality.

## 22. Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with significant harm to children, especially when combined with other features such as domestic violence. Further enquiries and or further action will be taken when the school receives reliable information about drug and alcohol abuse by a child's parents/carers in the following circumstances:

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

## 23. Children Living with Domestic Abuse

The Domestic Abuse Act 2021 applies to those aged 16 or over and 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 child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

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 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

St Faith's recognises 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.

At St Faith's we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to

identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

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.

On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in the child's MyConcern file. 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, Colleges and Early Years settings'.

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

St Faith's recognises that experiencing abuse or neglect or exploitation may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse, 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 college 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 (contextual safeguarding). 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.

St Faith'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.

#### **25. 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.'

HBA includes breast ironing, female genital mutilation (FGM) and forced marriage.

The school takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA. Staff are required to treat all forms of HBA as abuse and follow 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 pupil'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.

Advice and support can be sought from The NSPCC FGM helpline – 0800 028 3550.

## **26. Children at Risk of Child Sexual Exploitation (CSE)**

Child sexual exploitation 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. It can take many different forms from the seemingly 'consensual' relationship to serious organised crime involving gangs and groups. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

It is important to recognise that some young people who are being sexually exploited do not show any external signs of this abuse and may not recognise it as abuse.

The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

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

The Designated Safeguarding Lead will complete Safeguarding Children Partnership [Board's Exploitation Risk Assessment and Management Tool](#) and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

The school recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking.

## **28. Children frequently absent from education**

St Faith's recognises that children who have unexplainable and/or persistent absences from education, can act as 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 school monitors and follows up on the attendance of individual pupils closely, and analyses patterns of absence to aid early identification of concerning patterns of absence.

St Faith's has an admission register and an attendance register which all pupils are placed on in accordance with the law.

At St Faith's, parents are required to seek permission in writing for leave of absence prior to the event. These requests are then considered and authorised or declined by the Deputy Head or Head of Pre Prep in consultation with the Headmaster.

If a child is absent through illness, parents are required to telephone the school before 08:30 on each day of absence, giving details. Where a child is absent without explanation, contact will be made with the family by a member of the Office team. Tutors monitor children's attendance and any concerns regarding prolonged absence or patterns of absence are followed up.

The School will make contact with parents if a child has failed to arrive at school without explanation on their first day. If attendance is low or a pupil is frequently late for school, parents will be alerted to the concern. If there is no improvement in the pupil's attendance, and this falls below 95%, the family will be invited to school to discuss the concerns and strategies for reengaging the pupil. If the issue persists and/or the pupil is absent from school for a significant period of time without authorisation, the School has a legal obligation to report attendance issues or ask the police to undertake checks. Parents will be informed where contact is being made with the Local Authority over attendance, unless safeguarding concerns preclude this.

The School will notify Children's Social Care (CSC) if a child who is subject to a Child Protection (CP) plan is absent from education or there have been ongoing concerns.

## **29. Non-standard transitions**

Whenever a child leaves St Faith's before completing the final year or joins the School after the start of the first year, the School is required to:

- Inform Cambridgeshire County Council when a pupil is about to be deleted from the admissions register under any of the fifteen grounds (Regulation 8 of the 2006 Regulations);
- Record details of the pupil's residence, the name of the person with whom they will reside and the name of the destination school (where we can reasonably obtain this information);
- Inform Cambridgeshire County Council of the pupil's destination school and home address if the pupil is moving to a new school;
- The School understands the importance of working collaboratively with Cambridgeshire County Council in making reasonable enquiries to locate pupils who fail to return 10 days after an agreed authorised leave of absence or 20 days without authorisation.

## **30. Deleting a pupil from the school roll**

If the School is aware of the pupil's destination and have confirmation of the new educational placement and that the pupil has started at the new provision, the School is required to complete the 'Deletion from school register - Destination Confirmed Form (Independent Schools)' and send to [CME@cambridgeshire.gov.uk](mailto:CME@cambridgeshire.gov.uk)

In all other cases where the School is unaware of a pupil's destination and/or the pupil and family's whereabouts (including those pupils who fail to transfer to statutory education from nursery school) then a referral should be made to the Local Authority for Education Welfare Intervention, after the school has made initial investigation to the pupil's whereabouts. The 'CME Request for LA Intervention Form (Independent Schools)' should be

completed and sent to CME@cambridgeshire.gov.uk

When a parent elects to home educate, the School, not the parent, has a legal duty to notify the Local Authority. The 'EHE School Deregistration Form' should be completed and sent, along with a copy of the signed parent letter, to the Elective Home Education Office at ElectiveHome.Education@cambridgeshire.gov.uk.

### 31. Registering a new pupil

The School is required to inform Cambridgeshire County Council when registering new pupils within five days, including the pupil's address and previous school (where this information can be reasonably obtained).

If a child is missing from education and investigations are required to be undertaken, the following form should be used to make a referral to the local authority: [Children missing from education enquiry form - Data Protection - Cambridgeshire County Council website \(achieveservice.com\)](https://www.achieveservice.com/children-missing-from-education-enquiry-form-data-protection-cambridgeshire-county-council-website). For information on local authority contacts for attendance concerns see Appendix 8 and refer to the St Faith's Attendance Policy.

At St Faith's we 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.

### 32. Children at Risk of Radicalisation

St Faith's recognises that some children are susceptible to extremist ideology and radicalisation and that protecting children from this risk forms part of the school's safeguarding approach.

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

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers whether invited by staff or pupils, are suitable and appropriately supervised. The protocols at St Faiths are as follows:

- All visiting speakers to have a nominated point of contact at the school (the Organiser);
- Requesting the visiting speaker to complete the 'Visiting Speaker at St Faith's' electronic form, which asks them to outline the information they wish to communicate and to agree to the Guidelines for Visiting Speakers;
- Conducting research on the person/organisation to establish whether they have demonstrated extreme views/actions;
- Maintaining a formal register of all visiting speakers;
- Visitors to provide photo ID upon arrival at school;
- Refusal to allow people/organisations to use school premises if they have links to extreme groups or movements. Justification of the school's decision will be provided to the person/organisation in writing.
- Ensuring visiting speakers, without DBS, are accompanied at all times and are not left unsupervised with pupils at any point.

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 and reported

via MyConcern. The DSL will follow the procedures in Appendix 2 if making a Prevent referral.

For further information see 'The Prevent Duty, Guidance for specified authorities in England and Wales (2023).

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

The school will operate practices including ensuring appropriate DBS and reference checks are undertaken according to Part three of the government guidance 'Keeping Children Safe in Education' (September 2024) and the school's 'Recruitment & Selection Policy & Procedure'. This applies to staff, volunteers, contractors, and other individuals who are not school staff or supply staff.

The Headmaster, Deputy Head, Deputy Head Academic, Head of Pre Prep and Bursar have all successfully completed 'Safer Recruitment' Training. One of these staff members will be present in recruitment interviews.

The school will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of the Induction process, all staff, paid and unpaid, 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.

The school will ensure that staff and volunteers are aware that sexual relationships with pupils under the age of 18 are unlawful and could result in legal proceedings being taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust). The school will ensure that communication between pupils and adults, by whatever method, is transparent and takes place within clear and explicit professional boundaries and is open to scrutiny.

### **34. Mental Health**

This information should be used in conjunction with the Government document Mental health and behaviour in schools (November 2018).

All members of staff should flag up pupil mental health concerns as soon as they arise.

In Years 3 to 8, colleagues should contact the child's Tutor who in turn should liaise with the pupil's Head of House and Director of Pastoral Care. In the Pre Prep, pupil mental health concerns should be passed from the class teacher to the Head of Pre Prep. If it is a significant concern, the Head of Pre Prep/Director of Pastoral Care should liaise with the Deputy Head and/or Headmaster.

Where a mental health concern is linked to a safeguarding concern the DSL/DDSLs should be informed, and safeguarding procedures followed (as outlined in this policy).

When a pupil mental health concern is raised the parent(s) or carer(s) should be informed unless to do so would place the pupil at risk of harm. In this instance an immediate referral to Children's Social Care should be made.

Procedures which may take place in school following the raising of a mental health issue:

- Tutor to provide ongoing support to the pupil and liaise with the parent(s) under the direction of the Head of House/Director of Pastoral Care
- concern to be flagged up at the Weekly Individual Concerns Meeting (Years 3 to 8 staff)
- concern to be flagged up on Individual Concerns Registers (Pre Prep and Years 3 to 8)
- Health Centre team to be made aware and support if appropriate

- Learning Support Department to be made aware and support if appropriate
- where appropriate, weekly meetings to be arranged between the pupil and the School Counsellor

Where internal procedures are not working or additional (external) support is required, a pastoral meeting should take place between appropriate staff to discuss how to escalate the concern. This meeting should be chaired by the Director of Pastoral Care. The Director of Pastoral Care should decide on the best course of action and a referral to an appropriate external service should be made.

### **35. Governing body safeguarding responsibilities**

The Governing Body fully recognises its responsibilities with regard to child protection and 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:

- designate a governor for safeguarding and child protection who will take leadership responsibility for the school's safeguarding arrangements and practice and champion child protection issues;
- ensure that all governors 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 colleges 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. Any weaknesses will be rectified without delay;
- ensure that the Safeguarding and Child Protection Policy is reviewed at least annually and whenever needed, and updated and shared with staff;
- ensure that the Safeguarding and Child Protection Policy is made available 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 their effectiveness is regularly reviewed.
- ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

As the Governing Body provides extended school facilities and after school activities directly under the supervision or management of school staff, the school's arrangements for safeguarding as written in this policy shall apply.

Where services or activities are provided separately by another body the Governing Body will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the school on these matters where appropriate.

The governing body will use the guidance in ['After-school clubs, community activities and tuition: safeguarding guidance for providers'](#) which details the safeguarding arrangements that schools and colleges should expect these providers to have in place. The governing body 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.

**Dr C Hyde-Dunn**  
**Headmaster**

## Appendix 1: Staff Procedures in the Event of a Concern

1. If you have any cause for concern about the safety or welfare of a child, you should discuss the matter with a DSL/DDSL and report it via the electronic system MyConcern. In the event of a serious concern, where a child is at risk of significant harm, contact the DSL or a DDSL **immediately**, then complete a MyConcern entry. Staff or volunteers without access to MyConcern should complete a log of concern (blue form) from the staff room and place it in the pigeonhole of the DSL/DDSL.
2. In the event that a DSL/DDSL cannot be contacted, staff should pass on concerns firstly to the Deputy Head or if not available, to a member of the SMT. In line with KCSIE Sept. 2024, 'this should not delay appropriate action being taken'. Contact phone numbers for the DSL/DDSLs can be found on your Safeguarding Contact Details card.
3. Staff should be aware that they can contact Social Care, or the police directly, should the child be at risk of serious harm. Social Care Referral - 0345 045 5203 or Emergency Duty Team (out of hours) 01733 234724. Police - 101. If you have made a direct referral, you must ensure that a DSL/DDSL is informed as soon as possible.
4. When a concern is reported, the DSL/DDSL will decide on a course of action. You may have further involvement with this matter, or not, due to confidentiality. Each incident will be handled on a case-by-case basis.
5. In the case of a disclosure:
  - Bear in mind that if a pupil raises a concern with you, it will probably have taken a great deal of courage to do so, and they have chosen you as someone whom they trust and respect.
  - Try not to show shock or the fact that you may well be upset by what you have heard. Your immediate response will affect the way in which the child will continue to confide in you
  - Be gently supportive but try not to show excessive sentiment
  - Do not express any doubt or disbelief and avoid asking leading questions
  - Do not promise **not** to tell anyone. Explain that you may have to tell another person in order to help stop whatever it is that has been divulged to you
  - Listen carefully as you will need to make detailed notes afterwards
  - Never fill a silence
  - LISTEN, EXPLAIN, PASS ON and RECORD

The School's Designated Child Protection Officers		
	Mr Mike Critchley	Director of Pastoral Care Designated Safeguarding Lead (DSL) Prevent Lead E-Safety Coordinator  <a href="mailto:mcritchley@stfaiths.co.uk">mcritchley@stfaiths.co.uk</a>
	Mrs Louise Wakefield	Head of Pre Prep Deputy Designated Safeguarding Lead (DDSL) EYFS Safeguarding Lead  <a href="mailto:lwakefield@stfaiths.co.uk">lwakefield@stfaiths.co.uk</a>
	Ed Johnson	Head of Bentley House Deputy Designated Safeguarding Lead (DDSL) Domestic Violence Lead  <a href="mailto:ejohnson@stfaiths.co.uk">ejohnson@stfaiths.co.uk</a>
	Mrs Jo Walker	Head of Junior Faculty Deputy Designated Safeguarding Lead (DDSL)  <a href="mailto:jwalker@stfaiths.co.uk">jwalker@stfaiths.co.uk</a>
	Mrs Caroline Hendry	Deputy Head of Pre Prep Deputy Designated Safeguarding Lead (DDSL)  <a href="mailto:chendry@stfaiths.co.uk">chendry@stfaiths.co.uk</a>

## Appendix 2: DSL/DDSL Procedures in the event of a concern

1. On receipt of a verbal concern or one reported via MyConcern, the DSL/DDSL should make an entry in MyConcern as appropriate. Discussions may also take place with the colleague who reported the concern.
2. The DSL/DDSL decides on the course of action, consults, if necessary, with other designated personnel and/or the Headmaster.
3. One or more of the following actions may be taken:
  - a. Monitor the child and review the situation at regular pastoral or safeguarding children meetings.
  - b. Talk to the parents about a concern that has been raised, where parental contact is appropriate.
  - c. Refer to the Cambridgeshire and Peterborough Safeguarding Partnership Board's Safeguarding Children Partnership Board's Child Sexual Behaviour Assessment Tool if there is a concern that a child is displaying sexually harmful behaviours:  
[Child Sexual Behaviour Assessment Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)
  - d. For children in need of additional support, access services through the Early Help Hub (EHH) on 01480 376666 or through Liquid Logic.
  - e. Referrals under section 17  
If there are concerns but there is no immediate risk of significant harm, complete the referral form to Cambridgeshire Children's Social Care and e-mail to:  
<https://safeguardingcambspeterborough.org.uk/concerned/>
  - f. Referrals under section 47  
Make an urgent referral (if a child is at risk of immediate harm) via the Contact Centre 0345 045 5203 or Emergency Duty Team (out of hours) 01733 234724. Referrals should be followed up in writing within 24 hours to  
<https://safeguardingcambspeterborough.org.uk/concerned/>  
Or contact the Police on 101.
  - g. For advice and support in the event of a concern about extremism or terrorism, follow the normal safeguarding procedures. Support and advice can also be given by the police - 101. Alternatively call the LADO 01223 727967 or Prevent team: prevent@cambs.police.uk or telephone 01480 422596 or complete the referral form: [National Prevent referral form \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)
  - h. If an allegation is made against a member of staff, the procedures as detailed in the 'Safeguarding Children' policy (Appendix 6) will be followed. If the allegation relates to a member of supply staff provided by an agency, the agency will be fully involved.

### Appendix 3: Categories of abuse, neglect and exploitation

**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.

1. **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.
2. **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 from physical and emotional harm or danger
    - Ensure adequate supervision including the use of inadequate caregivers
    - Ensure access to appropriate medical care or treatment
    - Provide suitable education
3. **Emotional Abuse.** Is the persistent emotional ill treatment so as to cause severe and adverse effects on a child's emotional development.
  - 3.1 It may involve conveying to a child that they are:
    - Worthless
    - Unloved
    - Inadequate
    - Valued only insofar as they meet another person's need
  - 3.2 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
  - 3.3 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
  - 3.4 It may involve:
    - Seeing or hearing the ill-treatment of another
    - Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
    - Abuse by one or more pupils against another pupil
    - The exploitation or corruption of children



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

4. **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
    - encouraging children to behave in sexually inappropriate ways
    - grooming a child in preparation for abuse (including via the internet)

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

All staff are made aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside St Faith's or their home environment. 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.

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

## Appendix 4: E-Safety

### Introduction

These procedures clarify the precise arrangements for St Faith's and should be followed in conjunction with sections 134 – 146 and Part Two of KCSIE (September 2024).

It is the duty of St Faith's to ensure that every pupil in its care is safe; and the same principles apply to the digital world as apply to the real world. IT and online communications provide unrivalled opportunities for enhanced learning, but also pose greater and more subtle risks to young people. Our pupils are therefore taught how to stay safe in the online environment and how to mitigate risks, including but not limited to the risk of bullying, harassment, grooming, abuse and radicalisation.

Whilst exciting and beneficial, much IT, particularly online resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these internet technologies.

At St Faith's we understand the responsibility to educate our pupils on e-safety issues; teaching them the appropriate behaviours and critical thinking skills necessary to enable them to remain safe and within the law when using the internet and related technologies, in and beyond the classroom. We also understand the importance of involving pupils in discussions about e-safety and listening to their fears and anxieties as well as their thoughts and ideas.

This guidance is implemented to protect the interests and safety of the whole school. It applies to all members of the school community, including teaching and non-teaching staff, volunteers, governors, pupils, parents and visitors who have access to and are users of the school IT systems.

It aims to provide clear guidance on how to minimise risks and how to deal with any infringements. It is linked to the following school policies:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct (found in the Staff Handbook)
- Anti-Bullying Policy (Cyberbullying appendix)
- Data Protection Policy
- Information Technology Acceptable Use Policy
- Mobile Phone and other Smart Devices Policy
- Social Media Policy
- Taking, Storing and Using Images of Children Policy

All School policy documents are held on the server and may be accessed via SharePoint at [this link](#) and are accessible to parents on the school's [website](#) or can be provided upon request, at no charge..

This guidance covers both fixed and mobile internet devices provided by the school e.g. PCs, laptops, webcams, tablets, whiteboards, digital video equipment; as well as all devices owned by pupils, staff, or visitors and brought onto school premises e.g. personal laptops, tablets, smart phones.

### Roles and Responsibilities

#### *Headmaster*

The Headmaster is responsible for the safety of the members of the school community, and this includes responsibility for e-safety. The Headmaster has delegated day-to-day responsibility to the E-Safety Coordinator, Mike Critchley.

In particular, the role of the Headmaster and the Senior Management team is to ensure that:

- staff, in particular the E-Safety Coordinator, are adequately trained in e-safety; and
- staff are aware of the school procedures and policies that should be followed in the event of the abuse or suspected breach of e-safety in connection to the school.

#### *E-safety Coordinator*

The E-Safety Coordinator is responsible to the Headmaster for the day to day issues relating to e- safety. The E-Safety Coordinator has responsibility for ensuring this policy is upheld by all members of the school community and works with IT staff to achieve this. He will keep up to date on current e-safety issues and guidance issued by relevant organisations, including ISI, the Local Authority, CEOP (Child Exploitation and Online Protection), Childnet International and the Cambridgeshire and Peterborough Safeguarding Children Partnership Board.

#### *IT Staff*

The school's technical staff have a key role in maintaining a safe technical infrastructure at the school and keeping abreast with the rapid succession of technical developments. They are responsible for the security of the school's hardware system, its data and training the school's teaching and administrative staff in the use of IT. They monitor the use of the internet and emails, maintain content filters, and will report inappropriate usage to the E-Safety coordinator.

#### *Teaching and Support Staff*

All staff are required to sign the Information Technology Acceptable Use Policy before accessing the school's systems. Staff are encouraged to create a talking and listening culture in order to address any e-safety issues which may arise in classrooms on a daily basis.

#### *Pupils*

Pupils are responsible for using the school IT systems in accordance with the Information Technology Acceptable Use Policy and for letting staff know if they see IT systems being misused.

#### *Parents and Carers*

We believe that it is essential for parents to be fully involved with promoting e-safety both in and outside of school. We seek to promote amongst parents a wide understanding of the benefits and risks related to internet usage. The school will always contact parents if it has any concerns about pupils' behaviour in this area and likewise it hopes that parents will feel able to share any concerns with the school.

#### **Education and Training Staff: Awareness and training**

New staff receive information on e-safety matters as part of their induction. Teaching staff receive information and training on e-safety issues in the form of INSET training and are made aware of their individual responsibilities relating to the safeguarding of children within the context of e-safety. All staff working with children are responsible for demonstrating, promoting and supporting safe behaviours in their classrooms and following school e-safety procedures.

Any e-safety concern involving a pupil should be passed on to an appropriate member of staff and may be recorded in the electronic safeguarding system, MyConcern. An e-safety concern regarding a member staff should be passed on to the E-Safety Coordinator.

## **Pupils: e-safety in the curriculum**

We believe it is essential for pupils to receive e-safety teaching on a regular basis. The school provides opportunities for pupils to learn about e-safety within Computing lessons. Educating pupils on the dangers of technologies that may be encountered outside school will also be carried out via PSHCE, presentations in assemblies, and informally, when opportunities arise.

At age-appropriate levels within PSHCE, pupils are taught about their e-safety responsibilities and how to look after their own online safety.

Pupils are made aware of the impact of cyber-bullying and know how to seek help if they are affected by these issues (see also the School's Anti-bullying Policy - Cyberbullying Appendix, which describes the preventative measures and the procedures that will be followed when the school discovers cases of cyberbullying).

### *Parents*

The school seeks to work closely with parents and guardians in promoting a culture of e-safety. Within the Anti-bullying Policy - Cyberbullying Appendix, parents are advised how to proceed should their child be bullied on-line. The school recognises that not all parents may feel equipped to protect their child when they use electronic equipment at home. The school therefore provides information for parents on parental controls. Twice termly e-safety advice is provided in the Headmaster's Weekly Newsletter. For further information on informing and educating parents in e-safety, see the Cyberbullying Appendix to the Anti-bullying Policy.

## **Use of School and Personal Devices**

### *Staff*

Information on use of school devices can be found in the Information Technology Acceptable Use Policy. Teaching and support staff are required to read a list of rules regarding use of the network and internet and then sign to show that they understand and accept the policy.

School devices are assigned to a number of members of staff. They have a password or device lock so that others cannot access the content. When they are not using a device, staff should ensure that it is locked to prevent unauthorised access.

The protocols for staff use of personal mobile devices are explained in the Code of Conduct which forms part of the Teaching Staff Handbook.

Staff must not use personal mobile devices in the presence of children unless it is for essential school business or an emergency. Phone calls and texting should take place privately and away from the sight of pupils. In EYFS, personal mobile devices must be switched off or "on silent" and they must be situated in 'The Armario'.

Personal mobile devices must be switched off and out of sight during lessons and duties. The exception being in essential or emergency situations where staff are working off site, at sports matches, when members of the SMT need to be contacted in an emergency, and when staff need to report a missing child from a school activity or homework session. In these circumstances, wherever possible and practical to do so, phones should be used away from the presence of pupils.

Staff must not use personal mobile devices or cameras to take photographs/videos of children. Staff are only allowed to take digital/video images using school equipment (phones, iPads and cameras) and in order to support educational aims.

Personal telephone numbers of staff, email addresses, or other contact details must not be shared with pupils or parents.

### *Pupils*

It is recognised that personal mobile phones and other smart devices have the potential to be used inappropriately by pupils. The school has a separate policy for pupils on the use of personal mobile and smart technology. Mobile phones and other smart devices are handed in and kept during the school in a secure cabinet. For further information see the Mobile Phone and Other Smart Devices Policy.

The school recognises that mobile devices are sometimes used by pupils for medical purposes or as an adjustment to assist pupils who have disabilities or special educational needs. Where a pupil needs to use a mobile device for such purposes, a meeting will be arranged between the pupil's parents or carers and appropriate staff. The pupil's teachers and other relevant members of staff will be informed about how the pupil will use the device at school.

Information on the use of school devices can be found in the Information Technology Acceptable Use Policy. Pupils in Years 3-8 are required to read a list of rules about the use of the network and internet and then sign, to show that they understand and accept the policy. In the Pre Prep, parents are asked to talk to their child about safe use of the internet.

### **Use of Internet and Email**

#### *Staff*

For all information on the use of the internet and e-mail, refer to the Information Technology Acceptable Use Policy. For all information on appropriate use of social media refer to the Social Media Policy. References to social media can also be found in the Teaching Staff Handbook.

#### *Pupils*

All pupils are issued with their own personal school email addresses for use on our network. Access is via a personal login, which is password protected. This official email service may be regarded as safe and secure and must be used for all schoolwork and is monitored.

There is strong anti-virus and firewall protection on our network. Spam emails and certain attachments will be blocked automatically by the email system. (See the Anti-Bullying Policy – Cyberbullying Appendix for further information).

Pupils must not respond to any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and should immediately report such a communication to a teacher who, in turn, should contact the IT Manager and E-Safety Coordinator. (see the Anti-Bullying Policy – Cyberbullying Appendix for further information).

Pupils must report any accidental access to inappropriate materials to a member of staff who will, in turn, inform the IT Manager and E-Safety Coordinator. Deliberate access to any inappropriate materials by a pupil will lead to disciplinary action being taken. Pupils should be aware that all internet usage via the school's systems is monitored. For further information on pupil usage of the internet and e-mail, see the Information Technology Acceptable Use Policy.

## **Data storage and processing**

The school takes the security of data seriously. Please refer to the following documents for further information on data storage and processing:

- Data Protection Policy
- Data Retention Policy
- Information Technology Acceptable Use Policy
- Privacy notices

## **Password security**

Pupils, from Years 1 to 8, and staff have individual school network logins and storage folders on the server. Staff and pupils are regularly reminded of the need for password security.

All pupils and members of staff must:

- Use a password (these become increasingly longer and complex according to pupils' age). From Year 5 the password will usually contain eight characters or more, and upper and lower case letters as well as numbers, and be regularly changed.
- Should not write passwords down.
- Should not share passwords with other pupils or staff.

## **Safe Use of Digital and Video Images**

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents/carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying, stalking or grooming to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term.

Further information on the safe use of digital images for pupils, staff and parents can be found in the Taking, Storing and Using Images of Children Policy and Teaching Staff Handbook.

## **Misuse**

Illegal activities or activities that are inappropriate in a school context will be reported to the police and/or Cambridgeshire and Peterborough Safeguarding Partnership Board. If the school discovers that a child or young person is at risk as a consequence of online activity, it may seek assistance from CEOP.

Incidents of misuse or suspected misuse must be dealt with by staff in accordance with the school's policies and procedures.

The school will impose a range of sanctions on any pupil who misuses technology to bully, harass or abuse another pupil in line with our Anti-Bullying Policy.

## Appendix 5: The role of the Designated Safeguarding Lead (DSL)

This information should be used in conjunction with Annex C of KCISE September 2024.

The governing body should ensure that an appropriate member of the Senior Management Team is appointed to the role of designated safeguarding lead. The DSL should have appropriate status and authority within the school to carry out the duties of this post. The role carries a significant level of responsibility, and the DSL should be given the additional time, funding, training, resources and support they need to carry out the role effectively.

Schools can choose whether to have one or more deputy designated safeguarding leads (DDSLs). Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description.

The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety). Whilst the activities of the DSL can be delegated to appropriately trained deputies, the lead responsibility for child protection remains with the DSL and cannot be delegated. The DSL is the E-Safety Coordinator.

### Availability

During term time, the DSL/DDSL should always be available either in person or by phone (during school hours) for staff to discuss any safeguarding concerns. Staff are provided with a 'Safeguarding Contacts Card' with the names and contact details of the DSL/DDSLs and phone numbers for Cambridgeshire Social Care.

### Managing referrals

The DSL/DDSLs are expected to:

- refer cases of suspected abuse to the local authority children's social care
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme
- ensure cases are referred where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service
- refer cases where a crime may have been committed to the Police

### Working with others

The DSL/DDSLs are expected to:

- liaise with the Headmaster to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- liaise with the "case manager" (as per Part four of Keeping Children Safe in Education, September 2024) and the designated officer(s) at the local authority for child protection concerns, in all cases which concern a member of staff
- liaise with staff on matters of safety and safeguarding and act as a source of support, advice and expertise
- act as a point of contact with the safeguarding partners
- liaise with Social Care and EST (Education Safeguarding Team) where necessary
- promote supportive engagement with parents and/or carers in safeguarding and promote the welfare of children
- ensure that teaching staff are aware of any children who have had a social worker and support teaching staff in providing reasonable support and adjustments to help these children to achieve their potential

- ensure that staff are supported during the referral process
- Complete an annual safeguarding report for governors and report to governors termly about safeguarding matters

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

The DSL/DDSLs are responsible for:

- keeping detailed, accurate and up to date records of concerns and referrals and store this information confidentially and securely in MyConcern
- understanding relevant data protection legislation and regulations
- understanding the importance of information sharing both within school and with other agencies and the safeguarding partners
- ensuring that information is only accessed by those who need to see it
- ensuring that when a pupil leaves St Faith's the child protection file is transferred to the new school within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The file should be transferred securely and separately from the main pupil profile
- considering whether additional information should be shared with the new school prior to the pupil's arrival

### **Raising awareness**

The DSL/DDSLs should:

- ensure each member of staff has access to and understands the school's safeguarding policy
- ensure the school's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are reviewed regularly
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected cases may be made by the school
- make sure that staff are aware of local safeguarding arrangements and policies and training opportunities

### **Training, knowledge and skills**

The DSL/DDSLs should:

- undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.
- Lead staff safeguarding updates and training sessions as required
- undertake Prevent awareness training
- understand the assessment process for providing early help and social care referral arrangements
- have an understanding of how local authorities conduct a child protection case conference and child protection review conference and be able to attend and contribute to these effectively when required
- understand the lasting impact that adversity and trauma can have on a child's mental health and wellbeing and how to support with this
- be alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- provide advice and support to staff on protecting children from the risk of radicalisation
- understand the risks associated with online safety and have the relevant knowledge to keep children safe whilst they are online at school
- understand the additional risks faced by SEND children online e.g. from online bullying and grooming



- attend any relevant refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings amongst all staff, in any measures the school may put in place to protect them
- understand the difficulties children may have in approaching staff about safeguarding matters and consider how to build trusted relationships which facilitate communication.

## Appendix 6: Procedures for Allegations of Abuse against members of the School Staff or Volunteers

### Part 1: Concerns or allegations which meet the harms threshold

*These procedures clarify the precise arrangements for St Faith's and should be followed in conjunction with Part four of KCSIE September 2024.*

Allegations that a member of staff has abused a pupil or pupils or may pose a risk of harm, either inside or outside the school premises could be made by:

- Parents
- the abused pupil
- other members of staff
- other pupils
- the Police or Social services
- a third party

### What is the harms threshold?

The harms threshold is defined as:

- behaving in a way that has harmed a child, or may have harmed a child
- possibly committing a criminal offence against or related to a child
- behaving towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaving or may have behaved in a way that indicates they may not be suitable to work with children

Where there is a concern or allegation that any person working in the school, including supply teachers, volunteers and contractors, poses a risk of harm to a pupil, the reporting procedures (below) must be followed.

### Safeguarding responsibilities

St Faith's School fully recognises its responsibility to ensure that all members of staff and other adults working in or on behalf of the School have the skills, knowledge and understanding to safeguard the security and wellbeing of all pupils at the School.

A key element of this is a culture in which all concerns about adults (any adult working in or on behalf of the School, including members of staff, governors, contractors, volunteers and visitors) are shared promptly and appropriately. This will enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

St Faith's 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 pupils and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022).

As part of the Induction process, all staff, including supply staff, volunteers and contractors, will receive guidance about how to create appropriate professional boundaries (both online and offline) with all children, especially those with a disability or who are vulnerable.

### Reporting

Any allegation of abuse made against a member of staff, including supply staff, volunteers or contractors, which meets the harms threshold as set out in Keeping Children Safe in Education, 2024, Part Four, Section One, must be

reported straight away to the Headmaster. In cases where the Headmaster is the subject of an allegation, it must be reported to the governor who is Chair of the St Faith's Committee.

The school will consult with the Local Area 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' (September 2024) and the school's HR Policies, and seek advice from the school's HR provider.

The Headmaster or Chair of the St Faith's Committee will ensure that all allegations are reported to the LADO (see Appendix 8 – Useful Contacts) within one working day. The LADO will advise on all further action to be taken.

Before contacting the LADO, the school should conduct basic enquiries 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 School will use the guidance chart found in this appendix to support our decision-making.

The School will consider:

- Looking after the welfare of the child - the Designated Safeguarding Lead (or Deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

### **Investigation and disciplinary proceedings**

The school 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.

The Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension 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 children are protected.

### **Part 2: Low Level Concerns (Concerns which do not meet the harms threshold)**

In keeping with Keeping Children Safe in Education Part 4 (2024), St Faith's has an obligation to deal with any concerns or allegations which do not meet the harm threshold, referred to as 'low-level' concerns.

#### **Aims**

The key aims of this information are to:

- Provide an internal mechanism for reporting, and investigating, any low-level concerns relating to all adults working in or on behalf of the School;
- Maintain a culture of openness, trust and transparency;
- Encourage staff to voice any low-level concern, whether about their own behaviour or the behaviour of a colleague or another adult working in or on behalf of the School, and feel secure in doing so;

- Ensure that staff are aware of their duty of care towards pupils and their duty to abide by the Staff Code of Conduct at all times;
- Ensure that staff are aware of the appropriate reporting lines; and
- Ensure the School responds to low-level concerns appropriately, sensitively and proportionately by keeping information confidential where possible and protecting staff from false allegations or misunderstandings.

### What is a low-level concern?

The term 'low level' does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have behaved in a manner that:

- is inconsistent with the St Faith's Code of Conduct or may be perceived as inappropriate, particularly towards or around a child; *and*
- does **not** indicate that the adult poses a risk of harm by continuing to work in their present position or in any capacity with children (known as the harm threshold) or
- is **not** serious enough to consider a referral to the Local Authority Designated Officer (LADO).

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

- Showing favouritism
- Being overly friendly with pupils;
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a pupil on a one-to-one basis in a secluded area; and
- Humiliating a pupil.

Further examples of low level concerns can be found in the St Faith's Code of Conduct. An individual may have a low-level concern about another person, or indeed themselves. An individual may have behaved in a manner that, in hindsight, fell below the standards set out in the Code of Conduct, or that might have appeared to be compromising to others or which could be misconstrued.

Self-reporting is encouraged in these instances as it demonstrates self-awareness as to behavioural expectations of staff, ensures that staff aspire to the highest standards of conduct and behaviour and may allow staff to protect themselves from becoming the subject of potential false allegations/concerns and misunderstandings.

If you have safeguarding concerns about another member of staff, governor, contractor, volunteer or visitor which might pose a risk of harm to a child, such concerns are not considered to be low-level and these should be referred straight to the Headmaster in accordance with Part 1 of Appendix 6: 'Concerns or allegations which meet the harms threshold'.

### Procedure for reporting low-level concerns

Members of staff should report all low-level concerns to the Headmaster. In the absence of the Headmaster, or where the concern relates to the Headmaster, concerns should be reported to the DSL or Deputy Head. A concern should be reported as soon as practicable and within 24 hours of becoming aware of it.

The Headmaster, in liaison with the DSL, Deputy Head or other members of the SMT will decide upon the appropriate action to take, which may involve conversations with various staff members.

### **Anonymity**

Where the person raising the concern wishes to remain anonymous, this will be respected as far as possible. However, in order to conduct a fair and thorough investigation it may be necessary to use names and so anonymity cannot be promised. In the spirit of an open and transparent culture, staff and volunteers are encouraged to give their consent to be named, wherever possible.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) The concern(s) has been reclassified as an allegation (and only those that are substantiated will be included in references); or
- b) The concern(s) is sufficiently serious to result in formal action under the School's Grievance, Capability or Disciplinary Policy & Procedures

### **Responding to the Concern**

Investigation into a low-level concern will be carried out discreetly and on a need-to-know basis.

On receipt of the concern, the Headmaster or other delegated member of the SMT will take the following actions (not necessarily in the order set out):

- Speak to the person who raised the concern (unless it has been raised anonymously)
- Speak to any potential witnesses (unless advised not to do so by the LADO where they have been contacted)
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO where they have been contacted)
- Where the concern relates to the individual's behaviour or relationships outside the workplace, the school must conduct a risk assessment concerning transferrable risk into the workplace and the safety of children or adults at risk they work or volunteer with
- Review the information and determine whether the behaviour:
  - is entirely consistent with the St Faith's Code of Conduct
  - constitutes a low-level concern
  - is not serious enough to consider a referral to the local authority – but may merit consulting with and seeking advice from them
  - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO or equivalent local authority professional
  - meets the threshold of an allegation and should be referred to the LADO or equivalent local authority professional

### **Records during investigation**

Whilst conducting the investigation and making decisions, the appointed member of staff will make a record of:

- all internal conversations
- all external conversations – for example, with the LADO (should these have taken place)
- the rationale for decisions
- actions to be taken and by whom

The record will include the names, roles, dates and times of conversations; emails and other relevant documentation.

### **Possible Outcomes**

If the behaviour is found to be entirely consistent with the St Faith's Code of Conduct and the law the Headmaster or appointed member of staff will:

- update the individual in question and inform them of the action taken as above
- speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with the Code of Conduct
- consider if the situation may indicate that the Code of Conduct or Low-Level Concerns Policy are not clear enough, or if further training is needed

If the behaviour is found to constitute a low-level concern, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff and volunteers from any potential false allegations or misunderstandings. Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action.

Other concerns may most appropriately require management guidance and/or training including a refresher about the Code of Conduct and Professional Boundaries.

Conversations will include:

- being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, using examples
- explaining clearly what change is required in their behaviour
- discussing what, if any, support they might need in order to achieve and maintain the required behaviour
- being clear about the consequences if they fail to be consistent with the Code of Conduct and/or repeat the behaviour in question

The approach should be positive and avoid critical, threatening or blaming language or behaviour.

### **Follow up actions may include**

- ongoing and transparent monitoring of the individual's behaviour
- an action plan or risk assessment which is agreed with the individual, and regularly reviewed with them

### **More serious concerns**

- Where the concern is found to require other internal processes to be followed, such as disciplinary procedures, the Headmaster or appointed member of staff will exercise their professional judgement and, if in any doubt, they will seek advice from the LADO

## Data Protection

All information recorded in relation to low-level concerns is treated as confidential by the School, held securely and comply with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and any successor legislation. The School may in some circumstances share this information if it is necessary for the safeguarding of children and individuals at risk. Where appropriate and practicable, some or all of the information will be anonymised.

Data in relation to low-level concerns may be exempt from Data Subject Access Requests if:

- It has been given in a confidential reference;
- It complies with the Child Abuse Exemption under Paragraph 21, Part 5 of Schedule 3 Data Protection Act 2018;
- The matter concerns education, social services or medical data and disclosure risks serious harm to any individual;
- Where the organisation performs certain functions designed to protect the public, but only where disclosure is likely to prejudice the proper discharge of that function;
- If any third-party privacy rights can be argued.

Allegation or concern raised about a member of staff or adult



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

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

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

YES

NOT SURE

NO

Contact CCC LADO on 01223 727967 or via [LADO@cambridgeshire.gov.uk](mailto:LADO@cambridgeshire.gov.uk)

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

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

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

**Box A:**

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



## Appendix 7: Relevant Documents

[Disqualification under the Childcare Act 2006: statutory guidance for local authorities, maintained schools, academies and free schools \(August 2018\)](#)

[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 \(May 2024\)](#)

[Keeping children safe in education: Statutory guidance for schools and colleges \(Sept 2024\)](#)

[After-school clubs, community activities and tuition: safeguarding guidance for providers \(Sept 2023\)](#)

[Meeting digital and technology standards in schools and colleges \(May 2024\)](#)

[Mental health and behaviour in schools \(November 2018\)](#)

[The Prevent Duty, Guidance for specified authorities in England and Wales \(2023\).](#)

[Relationships and sex education \(RSE\) and health education: Statutory guidance on relationships education, relationships and sex education \(RSE\) and health education \(September 2021\)](#)

[The use of social media for online radicalisation \(July 2015\)](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(February 2024\)](#)

[Sharing nudes and semi-nudes: how to respond to an incident \(overview\) \(March 2024\)](#)

[What to do if you're worried a child is being abused: Advice for practitioners \(March 2015\)](#)

[When to call the police – guidance for schools and colleges \(National Police Chief Council\)](#)

[Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](#)

[Working Together to Safeguard Children \(February 2024\)](#)

## Appendix 8: Useful Contacts

Service	Contact Information
Attendance concerns	nsa.helpline@cambridgeshire.gov.uk
Attendance Improvement Officer	Tel: 07393 146916, Julia.Stead@cambridgeshire.gov.uk
Education Safeguarding Team	ECPS.General@cambridgeshire.gov.uk
Education Safeguarding Manager	Sara Rogers sara.rogers@cambridgeshire.gov.uk
Early Help Hub (EHH) (Targeted Support Service)	Tel: 01480 376666
Customer Service Centre – social care referrals	Tel: 0345 045 5203
Emergency Duty Team (Out of hours)	Tel: 01733 234724
Police Child Abuse Investigation Unit	Tel: 101
Local Authority Designated Officer (LADO)	Tel: 01223 727967, LADO@cambridgeshire.gov.uk
Named Senior Officer for allegations	Senior Leadership Adviser – Phil Nash Tel: 07920 270820
Prevent Officers	prevent@cambs.police.uk, Tel: 01480 422277
<a href="#">National Prevent referral form</a>	safeguardingcambspeterborough.org.uk
Safeguarding Partnership Board	<a href="#">Safeguarding Multi-Agency Procedures</a>