



CAMBRIDGE
SCHOOL OF
VISUAL &
PERFORMING
ARTS

SAFEGUARDING AND CHILD PROTECTION POLICY

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Introduction	4
Prevention.....	5
Procedures and relevant staff	6
The Governing Body ensures the Colleges will:.....	6
Governing Body Child Protection Responsibilities	7
Extra Curriculum Activities (on or off the Colleges’ sites).....	8
Liaison with Other Agencies.....	8
Record Keeping	8
Confidentiality and information sharing	9
The Colleges will:.....	9
Communication with Parents/Guardians	9
Peer on Peer Abuse.....	10
Dealing with Sexual Violence and Sexual Harassment between students.....	10
Supporting vulnerable Students	11
Preventing Unsuitable People from Working with Children	13
Allegations that may meet the harms threshold	14
Concerns that do not meet the harms threshold	14
Other Related Policies	15
Appendix A: ABUSE	17
Four categories of abuse.....	17
Specific safeguarding issues	18
Online-safety	18
Children showing signs of Abuse and/or Neglect	19
Students with Special Educational Needs (SEN/D).....	20
Young Carers	20
Children Criminal Exploitation (CCE)	20
Children Missing Education (CME).....	21
Children at Risk of Child Sexual Exploitation (CSE).....	21
Children Living with Domestic Abuse	22
Children at risk of ‘Honour- Based’ Abuse (HBA) including Female Genital Mutilation	22
Looked after children and previously looked after children.....	23
Children at Risk of Radicalisation.....	23
Children Misusing Drugs or Alcohol	23



CAMBRIDGE
SCHOOL OF
VISUAL &
PERFORMING
ARTS

Children who have Family Members in Prison 23

Further Information 24

Appendix B..... 24

 Contact Details 24

 Relevant Documents 24

Appendix C 26

 Staff Guidance for Safer Working Practice (Code of Conduct) 26

 Low Level Concerns Policy 27

 Low Level Concerns Form..... 31

Appendix D: What staff should do if they have concerns about another staff member who may pose a risk of harm to children 32

Appendix E: Overall process flowchart 33

Appendix F – Covid-19 Addendum 34

Introduction

CATS College Cambridge/CSVPA (the Colleges) fully recognises the responsibility it is required to have arrangements in place to safeguard and promote the welfare of children. ¹ This responsibility is set out under section 175 of the Education Act 2002, and the Education and Training (Welfare of Children) Act, 2021

The Colleges are committed to safeguarding and promoting the welfare of all students. All actions and decisions will be determined by what is considered to be in the best interests of the child. We expect staff, volunteers, visitors and students to share this commitment.

This responsibility is more fully explained in the statutory guidance for schools and Colleges “Keeping Children Safe in Education” (KCSIE, September 2021). All staff must be made aware of their duties and responsibilities under part one of this document (set out below). ²

Staff should read the above document together with ‘Annex B’ of ‘Keeping Children Safe in Education’, 2021 and ‘What to do if you’re worried a child is being abused: Advice for practitioners’ (March 2015) if they are working directly with children. For those staff who do not work directly with children or where English is a second language, translated versions of KCSIE2021 will be provided where available.

This guidance applies to all students enrolled in the Colleges.

Through their day-to-day contact with students, staff at the College have a responsibility to:

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

This policy sets out how the Colleges’ governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of all students at the Colleges. Our policy applies to all staff, paid and unpaid, working in the Colleges including governors, administrative staff as well as teachers, can be the first point of disclosure for a student. Concerned parents/guardians may also contact the College/s and its governors.

It is consistent with the Safeguarding Children Partnership Board procedures.

There are four main elements to our policy:

- **PREVENTION:** through the teaching and pastoral support offered to students and the creation and maintenance of a whole school protective ethos at both Colleges.
- **PROCEDURES:** for identifying and reporting cases, or suspected cases, of abuse. The definitions of the four categories of abuse are attached (see Appendix A)

¹ We require that Head Office staff who visit the Colleges undergo the iHasco Child Protection & Safeguarding online course. The names of the DSL and Designated persons for CATS Cambridge and CSVPA will also be shared with Head Office staff.

² Staff are required to read and follow the guidance contained in Appendix B (Included in Part 1 of the document).

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

Prevention

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

The Colleges will therefore:

- Establish and maintain an environment where our students feel safe in both the real and the virtual world and are encouraged to talk and are listened to
- Ensure students know that there are adults in their College whom they can approach if they are worried or in difficulty, and that their concerns will be taken seriously and acted upon as appropriate
- Ensure that students are aware of their right to speak with external support agencies, such as the Colleges' Independent Listener and/or the Children's Commissioner, and that signs are posted in the Boarding House with their contact details
- Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse in all contexts, including:
 - How to: determine whether other children, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed
 - The characteristics of positive and healthy friendships
 - That some types of behaviour within relationships are criminal, including violent behaviour and coercive control
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable
 - About online risks, including that any material someone provides has the potential to be shared online and the difficulty potentially compromising material removed once it has been placed online
 - What to do and where to get support to report material or manage issues online
 - The impact of viewing harmful content
 - That specifically explicit material, e.g., pornography, presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
 - That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships.
- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).
- We use Safer Corridors Toolkit developed by the PHSE Association which supports schools and colleges in preventing and reducing sexual violence and harassment and responding to incidents.

Procedures and relevant staff

- We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures'. A copy of these procedures can be found on their website: <http://www.safeguardingcambspeterborough.org.uk/children-board/>
- The Designated Safeguarding Lead (DSL) for CATS Cambridge is **Blake Feig (Head of Welfare)**
- The Designated Safeguarding Lead (DSL) for CSVPA is **Thomas Marty (Head of Welfare)**

The following members of staff have also received DSL Training:

- **Amna Blake:** House Director, CATS Cambridge, Deputy Designated Safeguarding Lead (DDSL)
- **James Todd:** Head of Boarding CATS Cambridge & CSVPA, DDSL
- **Elizabeth Nantais:** CSVPA Dean of Student Experience, DDSL
- The Designated Governor for Safeguarding is **Craig Wilson**
- The Chair of Governors is **Christopher Stacey**
- The Principal for CATS Cambridge is **Dominic Tomalin**
- The Rector for CSVPA is **Karin Askham**

The Governing Body ensures the Colleges will:

- Appoint a senior member of staff, from the leadership team to the role of Designated Safeguarding Lead (DSL).
- Ensure 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 Lead, DDSL), 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.
- 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, 2021, 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 bulletins, meetings or further reading at least annually.
- Ensure that every member of staff, paid and unpaid, and the governing body knows who the Designated Safeguarding Leads and Deputies are, and the procedures for passing on concerns from the point of induction. Staff members are required to log a concern via the electronic system and submit it to the DSL/DDSL immediately.
- Ensure that the Designated Safeguarding Lead (or a deputy) is always available for staff to discuss any safeguarding concerns. During weekday evenings and overnight the DSL is on call. At weekends there is a DP on call rota known to the Boarding Team. If, in exceptional circumstances, the DSL and DDSLs are not available then staff should consider speaking to a member of the senior leadership team and/or take advice from social care.
- Liaise with the three safeguarding partners (Local Authority, Clinical Commissioning Group and the police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018.
- Ensure every member of staff and every governor knows:
 - the name of the Designated Safeguarding Lead/Deputies and their role;
 - how to identify the signs of abuse and neglect;
 - how to pass on and record concerns about a pupil/student;

- that they have an individual responsibility to be alert to the signs and indicators of abuse; and for referring safeguarding concerns to the DSL/DDSL;
- that they have a responsibility to provide a safe environment in which children can learn;
- where to find the Inter–Agency Procedures on the Safeguarding Children Partnership Board website;
- their role in the early help process;
- the process for making referrals to children’s social care;
- the safeguarding response to children who go missing in education.
- Ensure all staff members undergo safeguarding and child protection training at induction. Ensure that staff training is regularly updated and that in addition to this training all staff members receive regular safeguarding and child protection updates as required but at least annually.
- Ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice regarding children, and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.
- Ensure that parents are informed of the responsibility placed on the school and staff in relation to child protection by setting out these duties in the school prospectus/brochure/website
- Ensure that this policy is available publicly either via the school website <https://www.catseducation.com/locations/cambridge/policies.htm>
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.
- Where pupils are educated off site or in alternative provision, the school and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the school.

Governing Body Child Protection Responsibilities

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

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

It will:

- Nominate a governor for safeguarding who has undertaken appropriate training, and will take leadership responsibility for the school’s safeguarding arrangements and practice and champion safeguarding issues.
- Ensure an annual safeguarding report is made to the full governing body and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.
- It will be published on the school website.
- Ensure that children’s exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems.
- Ensure children’s wishes and feelings are taken into account where there are safeguarding concerns.

Extra Curriculum Activities (on or off the Colleges' sites)

- Both Colleges provide boarding facilities and extra curriculum activities directly under the supervision or management of College staff, the Colleges' arrangements for Safeguarding as written in this policy shall apply.
- Where services or activities are provided separately by another organisation or individual, either on or off the Colleges' sites, the governing body will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the school on these matters where appropriate.

Liaison with Other Agencies

The Colleges will:

- Work to develop effective links with relevant services to promote the safety and welfare of all students
- Co-operate as required, in line with Working Together to Safeguard Children (July 2018), with key agencies in their enquiries regarding Child Protection matters including attendance and providing written reports at Child Protection conferences and core groups
- Notify the relevant Social Care Team immediately if:
 - It should have to exclude a student who is subject to a Child Protection Plan (whether fixed term or permanently);
 - There is an unexplained absence of a student who is subject to a Child Protection Plan
 - There is any change in circumstances for a student who is subject to a Child Protection Plan

Record Keeping

The Colleges will:

- Keep clear, detailed, accurate, written records of concerns about students (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. It is good practice to keep concerns and referrals in a separate safeguarding file for each child.
- Records should include:
 - a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.
 - Electronic records are stored on the student's record on Shackleton and in a Welfare folder on the Colleges' secure server.
- Ensure all relevant Child Protection records are sent to the receiving school or establishment when a student moves, within five days, in accordance with 'Keeping Children Safe in Education, 2021, (page 148) and the Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records.
- The DSL will consider whether it would be appropriate to share information with the new school/college in advance of a child leaving.
- Make parents/guardians aware that such records exist except where to do so would place the student at risk of harm.
- All actions and decisions will be determined by what is considered to be in the best interests of the child.

Confidentiality and information sharing

- Information about children and their families is defined as ‘special category data’, i.e., information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.
- Child protection information will be stored and handled in line with the principles described in the Data Protection Act 2018. The Data Protection Act does not prevent the Colleges’ staff from sharing information with relevant agencies, where that information may help to protect a student
- Child protection records are subject to the provisions of the Data Protection Act, 2018. This means that a parent, or young person of sufficient age and understanding, may make a request to see the Child Protection record. If any member of staff receives a request from a student or parents to see Child Protection requests, they will refer the request to the Designated Safeguarding Lead or Principal (or Rector) of their College.
- The Designated Safeguarding Lead will take advice from the Data Protection Officer (DPO) and together a decision will be made about what information to share. This decision will consider the balance between the potential risk to the child and the principle of working openly and honestly with parents.
- In cases where the ‘serious harm test’ is met, the Colleges understand they must withhold providing data in compliance with schools’ obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt the College/s will seek independent legal advice.

The Colleges will:

- Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the Designated Safeguarding Lead or Social Care as required.
- Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children (as set out in “Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers”, DfE July 2018)
- Ensure that the Designated Safeguarding Lead will only disclose any information about a student to other members of staff on a ‘need to know’ basis
- 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 if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner.
- Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent that they will refer the request to the DSL or Principal/Rector.
- Ensure staff are clear with students that they cannot promise to keep secrets

Communication with Parents/Guardians

The Colleges will:

- Ensure that parents/guardians are informed of the responsibility placed on the College/s and staff in relation to Child Protection by setting out its duties in the Colleges’ prospectus/website
- Undertake appropriate discussion with parents/guardians prior to involvement of another agency unless the circumstances preclude this action.
- Discuss with Children’s Social Care if the school/college believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime. Circumstances where parents may not be informed include, any disclosure of sexual abuse or physical abuse where the student has an injury.

- Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

Peer on Peer Abuse

We recognise that peer on peer abuse can manifest itself in many ways. These can include but are not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting (as defined in the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

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

The Colleges will therefore:

- Create a protective ethos across both colleges in which peer on peer abuse, including sexual violence and sexual harassment will not be tolerated.
- Provide training for staff about recognising and responding to peer-on-peer 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 peer-on-peer abuse, including sexual violence and sexual harassment as an inevitable part of growing up.
- Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- Ensure that staff members follow the procedures outlined in this policy when they become aware of peer-on-peer abuse.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Dealing with Sexual Violence and Sexual Harassment between students

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

Sexual violence and sexual harassment can occur between two children of any age and gender, from primary to secondary stage and into further education. It can occur online. It can occur through a group of children sexually assaulting or sexually harassing a single child or other group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

The Colleges will:

- Be clear that sexual violence and sexual harassment will not be tolerated.
- Provide training for staff on how to manage a report of sexual violence or sexual harassment
- Make decisions on a case-by-case basis.
- Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when making decisions.
- Implement measures to keep the victim, alleged perpetrator and, if necessary, other children and staff members, safe. Record any risk assessments and keep them under review.
- Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- Liaise closely with external agencies, including police and social care, when required.
- Refer to 'Keeping Children Safe in Education - Part Five', 2021, 'Sexual violence and sexual harassment between children in schools and colleges,' (DfE, September, 2021) for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020)

Supporting vulnerable Students

- We recognise that any student may be subject to abuse and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- We recognise that abuse or witnessing violence may have an adverse impact on students which may last into adulthood without appropriate intervention and support.
- This Colleges may be the only stable, secure and predictable element in the lives of student at risk. Nevertheless, when at College their behaviour may be challenging and defiant or they may become withdrawn
- We recognise that some vulnerable students may develop abusive behaviours and that these students may need to be referred on for appropriate support and intervention

The Colleges will support vulnerable students through:

- Curricular opportunities to encourage self-esteem and self-motivation
- An ethos that actively promotes a positive, supportive and safe environment and values the whole community
- The College's behaviour policy will support vulnerable students in the Colleges. All staff will agree on a consistent approach, which focuses on the behaviour of the student but does not damage the student's sense of self-worth. The Colleges will ensure that the student knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred
- Liaise with the DSL where safeguarding concerns are linked to mental health in school/college for advice on case management.
- Liaison with other agencies which support the student such as Social Care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help Teams
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- A commitment to develop productive and supportive relationships with parents/guardians

- Recognition that students living in a home environment where there is domestic abuse, drug or alcohol abuse or mental health issues are vulnerable and in need of support and protection; they may also be young carers
- Monitoring and supporting students' welfare, keeping records and notifying Social Care in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures'
- When a student is missing from education, the Colleges will follow the procedure as set out in Cambridgeshire's Children Missing Education guidance and inform the District Education Welfare Officer and Social Care if a student is subject to a Child Protection Plan or there have been ongoing concerns
- Recognition that whilst any child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety; contextual safeguarding. Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see pages 8 – 9 of Keeping Children Safe in Education, 2021 for the complete list.

Practicalities regarding disclosures

- You should always ensure that the time and place is appropriate to allow students to make a disclosure, if it is not, you should reassure the student that you understand they need to discuss something very important and that it warrants time, space and privacy. You should make time to meet before the end of the school day.
- In accordance with the Safeguarding Policy only work mobiles and email accounts should be used for any communication with students.
- You should make clear at the beginning of the conversation or communication that there are limits to confidentiality. You should generally inform the student when a confidence has to be broken, but in some circumstances you may speak to the DSL/Deputy DSL without informing the student.
- You should not use leading questions when receiving a disclosure from a student. You should ensure that you take effective, verbatim notes, this will help to avoid asking the student having to repeat distressing matters to several people.
- You must report any disclosures by students or parents involving the health or wellbeing of the student to the DSL as soon as possible after the disclosure.
- Any staff member may make a direct referral to Cambridgeshire Children's Social Care via the Customer service Centre
Tel: 0345 045 5203
- This includes:
 - Any form of abuse (physical, sexual, emotional or neglect)
 - Substance misuse or risk-taking behaviour
 - Medical concerns (including mental health, such as indications of self-harm)

This is not an exhaustive list.

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

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

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

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

Situations for immediate referral to the DSL, Children's Social Care or the Police

If at any time there is a risk of immediate serious harm to a student, a referral should be made to children's social care immediately. You should first attempt to contact the DSL/Deputy DSL. If you cannot do so then you should make a direct referral to Children's Social care via the Customer Service Centre Tel: 0345 045 5203. Inform the DSL/Deputy DSL of your action as soon as is practicable. If the student needs immediate medical attention contact the College Nurses or emergency services.

It is a statutory duty for teachers in England and Wales to report 'known' cases of Female Genital Mutilation (FGM) in under-18s which they identify in the course of their professional work to the police. (Multi-agency statutory guidance on female genital mutilation, July 2020). For further information see the FGM section below.

Preventing Unsuitable People from Working with Children

The Colleges will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to the government guidance 'Keeping Children Safe in Education' (2021) and the College's Recruitment Selection & Employment Policy

The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training. The following members of staff have undertaken Safer Recruitment training:

- Dominic Tomalin – Principal, CATS
- Karin Askham – Rector, CSVPA
- Kevin Hart – Provost, CSVPA
- Qadeer Afzal – Assistant Principal, CATS
- Martin Blake - Assistant Principal, CATS
- Rebecca Baker-Milne – Assistant Principal, CATS
- Jim Todd – Head of Boarding, CATS and CSVPA
- Weronika Habis – Deputy Head of Boarding, CATS and CSVPA
- Angel Luis Rodriguez Padilla – Deputy Head of Boarding, CATS and CSVPA
- Annie Boswell - HR Business Partner, CATS and CSVPA
- Chris Wilson - Operations Manager, CATS and CSVPA
- Blake Feig – Head of Welfare, CATS
- Tom Marty – Head of Welfare, CSVPA
- Eric Boston – Head of Humanities and Welfare, CATS
- Amna Blake – House Director, CATS
- Zoe Gilbertson – Course Leader, CSVPA
- Ed Dimsdale - Head of Graduate School, CSVPA
- Melanie Barbet Bruce - Digital Learning Officer, CSVPA
- Holly Fulton - Head of Fashion, CSVPA
- Liz Nantais - Dean of Student Experience, CSVPA
- Giusi Tocci - Head of Student Administrative Services, CSVPA
- John Blackman – Course Director, CSVPA
- Andrea Barnard - Senior Administrative Officer, CSVPA

Allegations that may meet the harms threshold

Any allegation of abuse made against a member of staff (including supply staff and volunteers) that meets the harms threshold as set out in Keeping Children Safe in Education, 2021, Part Four, Section One, will be reported straight away to the Principal/Rector.

In cases where the Principal/Rector is the subject of an allegation, it will be reported to the Chair of Governors. The Colleges will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2021.

The Colleges will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, volunteer or agency/supply staff and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', 2021 and the Company (CATS Global Schools) P&E Policies, seeking advice from the Colleges' P&E partner as needed.

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

Before contacting the LADO, The Colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

Where the College/s identify a child has been harmed they should contact children's social care and as appropriate the police immediately.

The Colleges will consider:

- Looking after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to the local authority children's social care.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action. The Colleges 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 College and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- CATS Cambridge & CSVPA will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 143 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

Staff (including supply staff and volunteers) who are the subject of a concern/allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that students are protected because it is considered that the person may pose a risk of harm to students.

Concerns that do not meet the harms threshold

Low level concerns that do not meet the harms threshold should be reported to the Principal/Rector. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

In cases where the Principal/Rector is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2021.

The College/s will deal with any such concern, no matter how small, where an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Details of the allegation and outcomes are kept on the employee's file

The Colleges will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable the school/college to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school/college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

- The Colleges will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents/guardians as advised within the code of conduct 'Staff Guidance for Safer Working Practice' (Appendix C). As part of the Induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.
- All staff have been made aware of the contents of the code of conduct 'Staff Guidance for Safer Working Practice' (Appendix C).
- The Colleges will ensure that staff, supply staff and volunteers are aware that sexual relationships with students aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Trust).
- The College/s will ensure that communications between students and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny.

Other Related Policies

- Anti-Bullying Policy
- Health and Safety Policy
- E-Safety and Acceptable Use Policy
- Whistleblowing Policy
- Complaints Policy
- Student Behaviour Policy



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SCHOOL OF
VISUAL &
PERFORMING
ARTS

- Staff Guidance for Safer Working Practice (Appendix C)
- Medical Care Policy
- Missing Student Policy
- Confidentiality Policy
- Misuse of Non-Prescribed Drugs Policy
- Equality and Diversity Policy
- Pastoral Principals and Welfare Policy
- Use of Reasonable Force Policy
- Recruitment Selection & Employment Policy

Appendix A: ABUSE

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

Four categories of abuse

Physical Abuse - may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Neglect - persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

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

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.
It also includes parents or carers failing to:

- Provide adequate food, clothing and shelter including exclusion from home or abandonment
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision including the use of inadequate caregivers
- Ensure access to appropriate medical care or treatment

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

It may involve conveying to a child that they are:

- Worthless
- Unloved
- Inadequate
- Valued only insofar as they meet another person's needs

It may include:

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

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

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

It may involve:

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

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

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

This may involve:

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

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Specific safeguarding issues

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

Online-safety

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

To mitigate risks the following arrangements are in place:

With respect to staff and students:

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

With respect to staff:

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

mobile phones have the potential to be used inappropriately and therefore the College has developed a policy to outline the required protocol for all staff, students, volunteers and parents/guardians.

With respect to students:

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

Cyberbullying

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

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

Sexting

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

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

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

Children showing signs of Abuse and/or Neglect

The Colleges recognise that, without appropriate intervention and support, children experiencing abuse or neglect may adverse effects which may last into adulthood The Colleges 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.

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. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

The College/s will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

Students with Special Educational Needs (SEN/D)

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 Colleges may have students with emotional and behavioural difficulties and/or challenging behaviours. The Colleges will support staff to decide appropriate strategies that will reduce anxiety for the individual student and raise self-esteem as part of an overall behaviour support plan agreed with parents/guardians
- The Colleges may have students who have communication difficulties and they are aware that they are vulnerable to abuse and may be disproportionately impacted by behaviours such as bullying because they are unable to express themselves to others. Instead such students will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the student.
- Staff must not assume that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration.
- Staff should recognise that these students are more vulnerable to peer-on-peer abuse than other students.
- We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

Young Carers

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

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

Children Criminal Exploitation (CCE)

Criminal exploitation (CCE) 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 (Keeping Children Safe in Education 2021). The Colleges will address indicators of Child Criminal Exploitation (CCE) with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

The designated personnel will complete Safeguarding Children Partnership Board's, 'Exploitation (CSE / Criminal/Gangs) Risk Assessment and Management Tool' and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

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



Children Missing Education (CME)

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

The Colleges monitor attendance of individual pupils closely, as outlined in the Attendance Policy, and analyse patterns of absence to aid early identification of concerning patterns of absence.

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

When a child is missing from education, the Colleges follow the procedure as set out in Cambridgeshire's Children Missing Education guidance <https://www.cambridgeshire.gov.uk/residents/children-and-families/schools-learning/education-your-rights-and-responsibilities/children-missing-from-education>

The Colleges will inform Social Care if a missing child is subject to a Child Protection Plan or there have been ongoing concerns.

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

Children 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 and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Sexual exploitation can take many different forms from the seemingly 'consensual' relationship to serious organised crime involving gangs and groups. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

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

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

Children Living with Domestic Abuse

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

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

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

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

The Colleges recognise that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The school will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

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

So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The Colleges take these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is over 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the student's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police.

Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

Looked after children and previously looked after children

The Colleges recognise that a previously looked after child potentially remains vulnerable. The Colleges 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 Local Safeguarding Children Board 'Inter-Agency Procedures.'

Children at Risk of Radicalisation

The College/s recognise that children are vulnerable to extremist ideology and radicalisation, similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach. The governing body will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent duty.

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. Each of the Colleges' designated safeguarding leads (and any deputies) should be aware of local procedures for making a Prevent referral. <https://www.safeguardingcambspeterborough.org.uk/children-board/professionals/prevent/>

See also 'The Prevent Duty, Departmental advice for schools and childcare providers', DfE (June 2015), and 'Revised Prevent Duty Guidance: for England and Wales,' HM Government, (July 2015), The Prevent duty: Departmental advice for schools and childminders (June 2015).

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;
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance associated criminality

Children who have Family Members in Prison

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



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Further Information

In addition to the information above it is important that staff who work directly with students recall the further information found in KCSIE 2021 Annex B.

Appendix B

Contact Details

Blake Feig DSL (CATS Cambridge)	Tel: +44 (0)7773 971 651
Thomas Marty DSL (CSVPA)	Tel: +44 (0)7912 555 773
Dominic Tomalin, Principal (CATS Cambridge)	Tel: +44 (0)7837 122 866
Karin Askham, Rector (CSVPA)	Tel: +44 (0)7850 518 010
Craig Wilson, Designated Governor for Safeguarding	Tel: +44 (0)7860 407 641
Christopher Stacey, Chair of Governors	Tel: +44 (0)7912 575 790
Education Safeguarding Team	ECPS.General@cambridgeshire.gov.uk
Early Help Hub (EHH)	Tel: +44 (0)1480 376 666
Customer Service Centre (Social Care referrals)	Tel: +44 (0)345 045 5203
Emergency Duty Team (Out of hours)	Tel: +44 (0)1733 234 724
Police Child Abuse Investigation Unit	Tel: 101
Local Authority Designated Officer (LADO) LADO@cambridgeshire.gov.uk	Tel: +44 (0)1223 727 967
Senior Education Adviser – Phil Nash	Tel: +44 (0)1223 699 448
Prevent Engagement Team	Tel: +44 (0)1480 422 596 prevent@cams.pnn.police.uk

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding Inter-Agency Procedures
<http://www.safeguardingcambspeterborough.org.uk/children-board/>

Relevant Documents

“Keeping Children Safe in Education: Statutory guidance for schools and colleges” (September 2021)

Safeguarding and remote education during coronavirus (COVID-19) (May 2020)



CAMBRIDGE
SCHOOL OF
VISUAL &
PERFORMING
ARTS

“Guidance for Safer Working Practice for those working with children and young people in education settings” (May 2019)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)

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

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

“Sexual violence and sexual harassment between children in schools and colleges” (September, 2021)

Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, December 2020)

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

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (July 2018)

Appendix C

Staff Guidance for Safer Working Practice (Code of Conduct)

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

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

- Never making sexually suggestive comments to students in jest or fun, nor engaging in rough, physical or sexually provocative games, including horseplay
- Never asking for personal information without providing an explanation of:
 - the reason making the request
 - how the information is going to be used and stored
 - and being clear confidentiality and privacy are not guaranteed.
- Doing things of a personal nature for a student that they can do for themselves
- If a student approaches you inappropriately, discourage them and ensure you implement safe working practices such as: you are never alone with them, informing your line manager immediately or as soon as possible. In addition, make a written record of what has happened, including dates and times; what you said to the student with whom you spoke, as soon as possible after the event; and also note what advice you were given.
- If you find yourself in the position of teaching one on one always notify your line manager or another member of staff of the situation. If you have to move location, then this also needs to be made known. Always leave the classroom door open and always make sure the student sits nearest the door. Where this is not possible, never obstruct exit pathway of the student by placing yourself between the exit and the student.
- If you have to speak to a student on a personal matter, it is always best practice to have another member of staff present. Where this is impossible, notify your immediate line manager prior to speaking to the student and where this is not feasible then do so as soon as you possibly can, remembering to record notes about the interaction.
- If you are teaching a subject which requires physical contact to support your teaching such as in music or sports, ensure that you have made the student aware that physical contact is required, i.e. "I am going to show you how to place your arm. Is it ok if I hold your arm?" You should never engage in physical contact without prior agreement with the student.
- It is not appropriate for staff to socialise with students without the College being aware, and it is not appropriate for staff to use chat rooms or other online forums other than those that have been set up by the College to communicate with students Staff should always communicate within clearly defined boundaries. Staff should ensure that:
 - Personal social networking sites are set at private and never listed as approved contacts
 - Staff never use or access social networking sites of students
 - Staff do not give their personal contact details to students, including their mobile telephone number or email address
 - Staff only use equipment e.g., mobile phones, provided by school/service to communicate with students, making sure that parents have given permission for this form of communication to be used
 - Staff only make contact with students for professional reasons and in accordance with any College policy
 - Staff recognize that text messaging should only be used a part of an agreed protocol and when other forms of communication are not possible

- Staff do not use internet or web-based communication channels to send personal messages to a young person
- Staff may not register or post on the CATS Cambridge or CSVPA Facebook page without the express permission of the Principal or Rector. A new account must be created without any personal details or friends on and students may not access any personal information about you. Your College email should be used to sign up and not a personal one.
- Staff may not drive students in their own car unless they have business insurance and have logged all documents with the Operations/H & S Transport Manager. Staff may use company vehicles to transport students where this is required by other College policies and where they, the driving staff member(s), has signed the vehicle out from an authorised person who has confirmed that the driving staff member(s) has met the requirements stipulated in the company's employee handbook and the company's vehicle management policies. Company vehicles may include, from time to time, vehicles hired by the company. Where this is the case the hire vehicle will be brought onto the company's fleet for the purposes of insurance and may then be treated as any vehicle owned by the College. In all other circumstances, any student needing transportation must therefore be transported by our registered Taxi company whose drivers are all DBS checked.
- Staff should not use personal mobiles to contact students at any time.
- Staff should not use personal cameras to take pictures of students.

As the University Foundation Programme has a shelf life of two years it is not considered appropriate for staff to have contact with former students for two years after they have left the College. Staff may however contact students or former students at any time using CATS College email.

In terms of physical contact with students, always remember whether behaviour is situational appropriate - a hug initiated by the student at graduation in the presence of others would be viewed differently to a hug initiated by you alone in a classroom. Again, with any allegation, history of initiating contact is seen as a contributing factor.

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

NB The above guidance should not be considered exhaustive and more detailed guidance can be found in "Guidance for Safer Working Practice for those working with children and young people in education settings" (May 2019). If staff feel further guidance is required for specific posts/activities, or they have any concerns regarding the appropriateness of any practice/action they should contact their line manager/senior manager/DSL.

Low Level Concerns Policy

Principles

The College/s are committed to ensuring Low-Level Concerns are monitored, recorded and dealt with appropriately to create a safer culture for all staff, students and visitors.

CATS Cambridge & CSVPA have a moral, legal, and social responsibility to provide a safe environment for students studying and residing with us.

Scope and References

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

Distinction between an allegation and a Low-Level concern

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

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

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

behaved in a way that has harmed a child, or may have harmed a child;
possibly committed a criminal offence against or related to a child;
or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
An allegation can also relate to an adult's behaviour outside of work, and their relationships with others, if they:

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

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

A Low-Level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

is not consistent with an organisation's Code of Conduct, and/or
relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Principal.

Importance of sharing Low-Level concerns

It is necessary to ensure a culture of openness and trust is fostered within an organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive

manner. It is well documented that organisational child sexual abuse is often preceded by grooming, and that such conduct was observed and considered questionable. This could be targeted at protective adults, not just children or vulnerable adults. This behaviour was rarely reported to the relevant individual in the organisation, was not recorded, and not available later for evaluation of patterns emerging. It is not possible for individuals to accurately judge people, as there is no one profile to describe everyone who abuses a child, so focus should be placed upon specific behaviours.

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

Implementation

To be effective, this policy must have ‘buy in’ from all staff, and leaders must be seen to adhere to and model the expected values and behaviours as written in the policy.

Training on this policy will be incorporated in both the Safeguarding Induction Training for new staff and the Annual Safeguarding Training for all staff. Staff should complete the ‘Low Level Concern Form’ in Appendix 1 as fully as possible and pass it directly to the Principal, or in their absence the Chair of Governors, without informing the adult who is the subject of the form. If the concern is about the Principal it should be passed to the Chair of Governors without informing the Principal.

When a low-level concern has been raised by a third party, the Principal should collect as much evidence as is possible by speaking with the person who raised the concern, to the individual and to any witnesses.

Any concerns or issues relating to the Low-Level Concern Policy will be included in the annual safeguarding report to governors.

Data protection

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

How Low-Level concerns will be recorded

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

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

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

Review of the central Low-Level concerns file

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

Retention of Low-Level concern records

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

10. Should Low-Level Concerns be referred to in a reference?

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

11. Role of the Governing Body

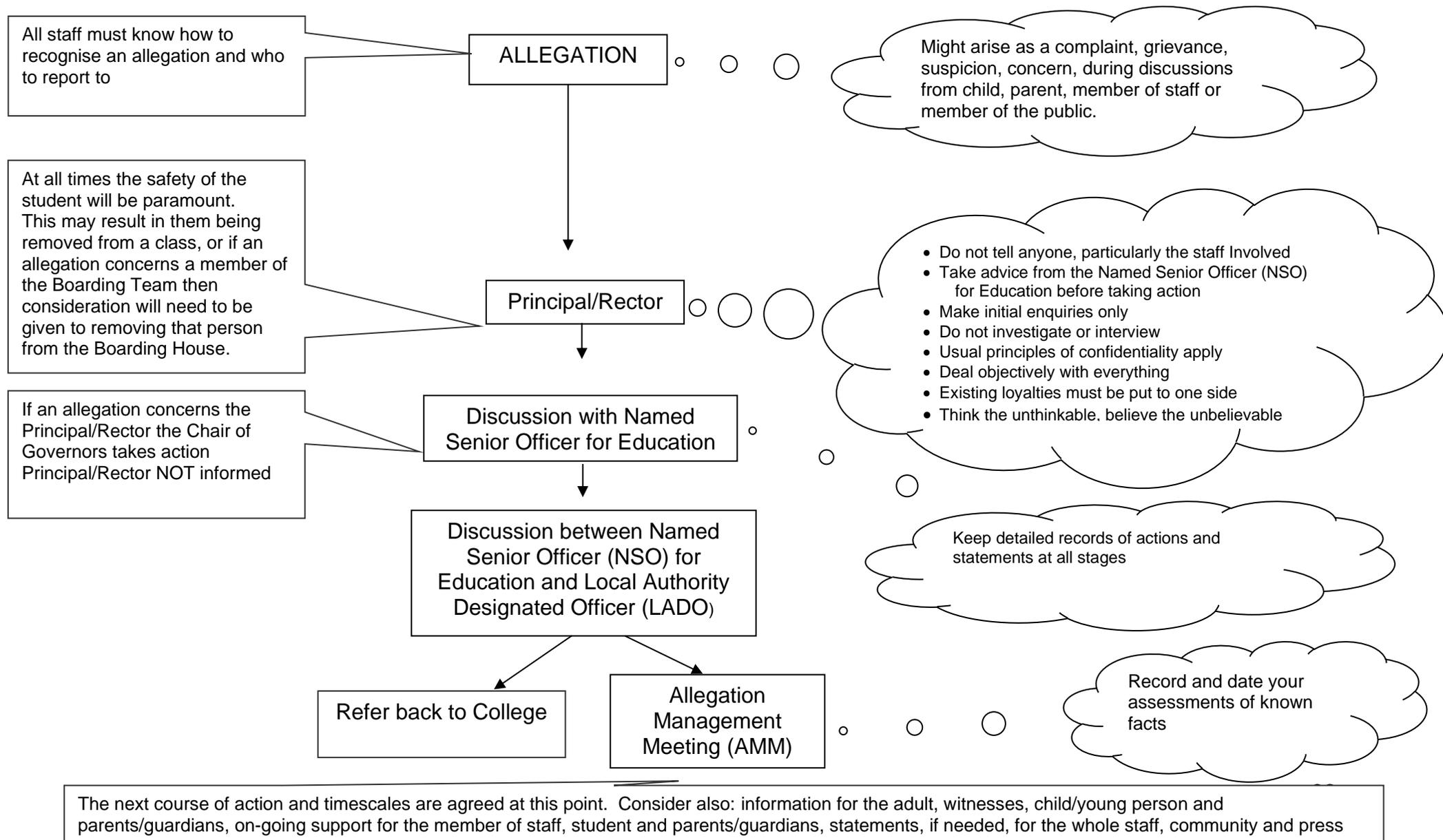
The DSL's will include information about the implementation of the Low-Level Concern Policy and any evidence as to its effectiveness, with any relevant data, in the Termly Reports to the Governors



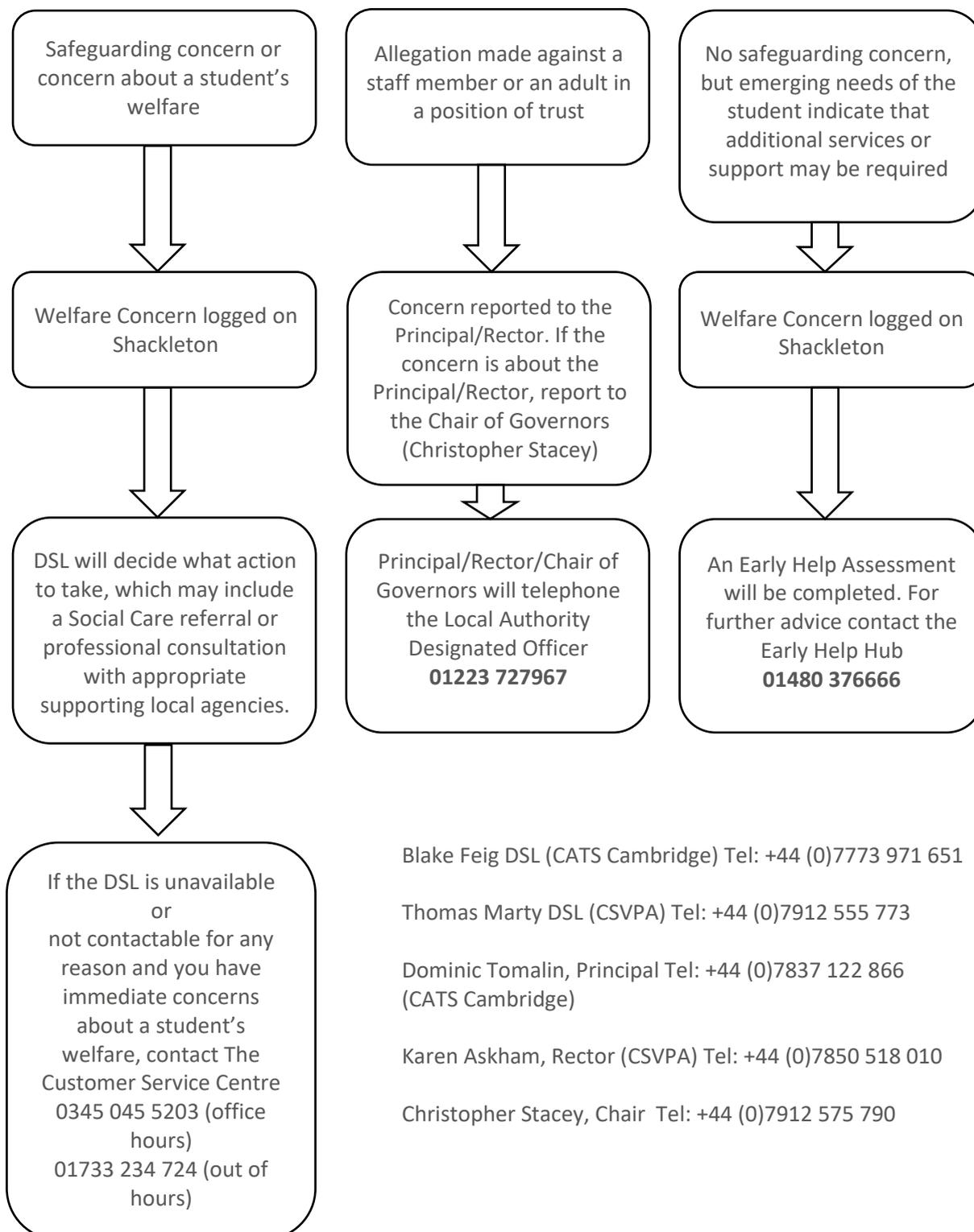
Low Level Concerns Form

<input type="checkbox"/> Accident	<input type="checkbox"/> Incident	<input type="checkbox"/> Safeguarding Concern
Date of incident:		
Name, date of birth and details of the person(s) the report is being made about:		
Account of incident or concern: (give clear details relating to what happened, where, when, who was involved, what was said, nature of injury or behaviour, any witnesses etc keep it factual).		
(see also KCSIE Part four)		
Action taken:		
Name of person making the report:		
Signed:		
Date:		
ADMIN USE ONLY		
Designated Safeguarding Officer:		
Signed:		
Date:		
Further action taken:		

Appendix D: What staff should do if they have concerns about another staff member who may pose a risk of harm to children (see also KCSIE Part four)



Appendix E: Overall process flowchart





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Appendix F – Covid-19 Addendum

SAFEGUARDING AND SAFEGUARDING AND CHILD PROTECTION POLICY COVID-19 SCHOOL ARRANGEMENTS FOR CATS CAMBRIDGE & CSVPA

Date added to Policy	Sept 2020
Approved by Board of Governors	26th September 2020
Next Review Date	As required, based on UK Government guidance
Lead for Review	Principal, Rector, DSLs, Designated Governor for Safeguarding and Child Protection



Introduction

From 20th March 2020 parents were asked to keep their children at home, wherever possible and where it was safer to do so. Schools are to remain open only for those children of workers critical to the COVID-19 response and children who are vulnerable, with an EHCP or have an allocated Social Worker.

This revised addendum of CATS Cambridge and CSVPA Safeguarding and Child Protection Policy contains details of our individual safeguarding arrangements during this time, to protect all children, whether attending school or remaining at home, from harm and abuse.

CATS Cambridge and CSVPA are committed to ensuring the safety and wellbeing of all their students and will ensure compliance with Keeping Children Safe in Education (KCSIE) which remains in force throughout the response to coronavirus (COVID-19).

The following safeguarding principles therefore remain unchanged:

- The best interests of children must always continue to come first;
- If anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately;
- A DSL or deputy should be available;
- It is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children;
- Children should continue to be protected when they are online.

Key contacts

Role	Name	Contact number	Email
Designated Safeguarding Lead	Blake Feig CATS Cambridge	+44 7773 971 651	bfeig@catscambridge.com
	Thomas Marty CSVPA	+44 7912 555 773	tmarty@csvpa.com
Deputy Designated Safeguarding Leads	James Todd CATS Cambridge	+44 7900 490 117	jtodd@catscambridge.com
	Amna Blake CATS Cambridge	+44 7741 144 280	ablake@catscambridge.com
	Elizabeth Nantais CSVPA	+44 7747 533 306	enantais@csvpa.com
Principal	Dominic Tomalin CATS Cambridge	+44 7837 122 866	dtomalin@catscambridge.com
Rector	Karin Askham CSVPA	+44 7850 518 010	kaskham@csvpa.com
Chair of Governors	Christopher Stacey	+44 7912 575 790	cstacey@ceg-uk.com



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Supporting Children in School

CATS Cambridge & CSVPA is committed to ensuring the safety and wellbeing of all its students.

CATS Cambridge & CSVPA will continue to be a safe space for all children to attend and flourish. The Principal will ensure that appropriate staff are on site and staff to student ratio numbers are appropriate, to maximise safety.

CATS Cambridge & CSVPA will refer to the Government guidance for education and childcare settings on how to implement social distancing: [implementing protective measures in education and childcare settings](#)

CATS Cambridge & CSVPA will continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

CATS Cambridge & CSVPA will continue to be a safe spaces for all children to attend and flourish. We recognise that for some children the return to school after an extended period of time at home will be challenging and staff will support children to adjust to the necessary changes to the school environment and routines. Supporting pupil wellbeing will be at the forefront of our approach and school staff will seek to provide reassurance to pupils as we manage the transition period. Staff will talk to the children about the changes to the school day in an age appropriate manner, acknowledge and listen to pupil anxieties and support children to understand the altered routines.

CATS Cambridge & CSVPA recognise that the current circumstances may adversely affect the mental health of children and their parents. School staff have been briefed to look out for changes in behaviour or in a child's emotional state, which could range from being excessively clingy, fearful, withdrawn or aggressive as more children return to school. As always, pupil wellbeing is at the heart of our work, and school staff will seek to provide appropriate support for pupils both in school and where required from specialist services.

Supporting children not in school

CATS Cambridge & CSVPA is committed to ensuring the safety and wellbeing of all its children and young people.

CATS Cambridge & CSVPA recognise that some children will not be eligible to return to school immediately due to the phased nature of re-opening, potential travel and visa limitations and that some parents/carers of children eligible to attend may choose not to send them to school at this time.

CATS Cambridge & CSVPA recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at school name need to be aware of this in setting expectations of pupils' work where they are at home.

Where the DSL has identified a child about whom there have been concerns but not currently open to social care, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person.



Details of this plan will be recorded, as should a record of all contact made.

CATS Cambridge & CSVPA and their DSLs will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly and where concerns arise, the DSL will consider any referrals as appropriate.

The College Counsellor and members of the Welfare Team will continue to contact those students who have been identified as requiring extra support. Where appropriate, those students will continue to be offered support sessions online.

If we are unable to contact a child about whom there have been concerns after a reasonable number of attempts, we may need to seek further advice about safe and well checks.

The school will share safeguarding messages on its website and social media pages.

CATS Cambridge & CSVPA will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them.

Vulnerable children

Vulnerable children include those who have a Social Worker and those children and young people up to the age of 25 with Education, Health and Care Plans (EHCP).

Those who have a Social Worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989. Senior leaders, especially the Designated Safeguarding Lead (and deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those about whom there have been concerns but not currently open to Social Care.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

Currently CATS Cambridge & CSVPA do not have any students who are classified as Vulnerable Children. We will however continue to work with and support children's Social Workers to help protect vulnerable children when needed. This includes working with and supporting children's Social Workers and the Local Authority Virtual School Head (VSH) for looked-after and previously looked-after children. The lead person for this will be: Blake Feig (CATS Cambridge) and Thomas Marty (CSVPA)

There is an expectation that vulnerable children who have a Social Worker will attend an education setting, so long as they do not have underlying health conditions that put them at increased risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the Social Worker and CATS Cambridge & CSVPA & CSVPA will explore the reasons for this directly with the parent.



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Where parents are concerned about the risk of the child contracting COVID19, CATS Cambridge & CSVPA or the Social Worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

CATS Cambridge & CSVPA will encourage our vulnerable children and young people to attend a school, including remotely if needed.

Attendance monitoring

Local Authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

All lessons will be taught online until September 21st, 2020 and teachers will provide tuition from home. The students who are in our boarding houses, will continue to be monitored in boarding. Morning registers and evening curfew checks will continue to be completed daily. Full details of the College's processes for attendance can be found here: https://www.catseducation.com/ugc-1/1/7/0/attendance_and_engagement_policy.pdf

CATS Cambridge & CSVPA will follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

How Will This Look in CATS Cambridge & CSVPA?

To support the above, CATS Cambridge & CSVPA will, when communicating with parents/carers and carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues, CATS Cambridge & CSVPA will notify their Social Worker.

Designated Safeguarding Lead Arrangements

CATS Cambridge & CSVPA have Designated Safeguarding Leads (DSL's) and Deputy DSL's.

The Designated Safeguarding Leads are: Blake Feig (CATS Cambridge) and Thomas Marty (CSVPA)

The Deputy Designated Safeguarding Leads are: James Todd and Amna Blake (CATS Cambridge) and Elizabeth Nantais (CSVPA)

We will endeavour to have a trained DSL (or deputy) available on site. Where this is not possible, a trained DSL (or deputy) will be available to be contacted via phone or email or through our electronic recording system, Shackleton.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for coordinating safeguarding on site.



It is important that all CATS Cambridge & CSVPA staff and volunteers have access to a trained DSL (or deputy). On each day, the staff on site will be made aware of who that person is and how to contact them.

The DSL will continue to engage with Social Workers, and attend all multi-agency meetings, which are being held remotely.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the College's Safeguarding and Child Protection Policy. CATS Cambridge & CSVPA uses an electronic recording system, Shackleton, which staff are able to access from home.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the school, they should report the concern to the Principal according to the Safeguarding and Child Protection Policy.

If there is a requirement to make a notification to the Principal whilst away from school, this should be done verbally and followed up with an email to the Principal.

Concerns around the Principal should be directed to the Chair of Governors: Christopher Stacey.

Safeguarding Training and induction

DSL training will continue in modified form whilst there remains a threat of the COVID 19 virus. For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

The Local Authority Education Safeguarding Team is providing advice and guidance, where needed, to schools through a dedicated helpline.

All existing school staff have had safeguarding training and have read Part 1 of Keeping Children Safe in Education (2021). All staff will receive updates as appropriate and will follow the guidance set out in Keeping Children Safe in Education 2021. The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter CATS Cambridge & CSVPA, they will continue to be provided with a safeguarding induction.

Upon arrival, they will be given a copy of the receiving setting's Safeguarding and Child Protection Policy, guidance on local processes and confirmation of DSL arrangements

Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, CATS Cambridge & CSVPA will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2021).



In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

If staff are deployed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

Where CATS Cambridge & CSVPA are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 183 to 188 of KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

CATS Cambridge & CSVPA will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 179 of KCSIE.

CATS Cambridge & CSVPA will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 143 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

During the COVID-19 period all referrals should be made by emailing:
Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, CATS Cambridge & CSVPA will continue to keep the single central record (SCR) up to date as outlined in paragraphs 164 to 171 in KCSIE.

Online safety in schools and colleges

CATS Cambridge & CSVPA will continue to provide a safe environment, including online. This includes the use of an online filtering system.

Where students are using computers in school, appropriate supervision will be in place.

Children and online safety away from school and college

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding and Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.



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VISUAL &
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School closures bring lots of challenges for both school staff and parents, and both are increasingly looking to the benefits of technology to continue delivering some form of learning experience for children.

As always, there are huge benefits to be gained from the appropriate use of technology, and accessing learning resources whilst at home is a great example of this. However, parents (and teachers) need to be aware of the potential risks that go along with this.

CATS Cambridge & CSVPA will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. All staff will continue to follow the guidance for communicating with students online as outlined in the College's Safeguarding and Child Protection Policy and Guidance for Safer Working Practice, Addendum April 2020.

<https://www.saferrecruitmentconsortium.org/GSWP%20COVID%20addendum%20April%202020%20final-1.pdf>

Peer on Peer Abuse

CATS Cambridge & CSVPA recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

Where a school receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within of the Safeguarding and Child Protection Policy.

The school will listen and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded and appropriate referrals made.

Children moving schools

As always, where children join our school from other settings we will seek confirmation from the DSL whether they have a Safeguarding File or SEN statement/EHCP. This file must be provided securely before the child begins at our school and a call made from our DSL or a deputy to the placing school's DSL to discuss how best to keep the child safe.

In some unusual circumstance this may not be possible. Information provided must include contact details for any appointed Social Worker and where relevant for the Virtual School Head.

Safeguarding information about children placed in our school will be recorded on our safeguarding system, will be securely copied to the placing school DSL and will be securely returned to the placing school on completion of the child's placement with us so there is a continuous safeguarding record for the child.

The DSL will undertake a risk assessment in respect of any new information received, considering how risks will be managed and which staff need to know about the information. This will be recorded on our safeguarding recording system.