



Child Protection and Safeguarding Policy

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1.0 Introduction

CSFC Cambridge aims to create pupils who whilst attaining their full, unique academic potential are independent, self-sufficient young adults with a genuine care and interest in others. As such, the College aims to nurture and develop each individual pupil, enabling all to thrive within a mutually respectful, safe and supportive environment. The College is committed to safeguarding its pupils and through a culture of vigilance; staff recognise their moral and statutory responsibilities in safeguarding and promoting the welfare of all children.

The College supports all students who are vulnerable and at risk by engaging in preventative measures; by exploring methods of intervention via the education of pupils or via pastoral support plans. The College communicates well with staff, students and parents to ensure successful outcomes for those pupils who are most at risk.

There are five main elements to Cardiff Sixth Form College's Child Protection and Safeguarding Policy, all of which take account of two key principles, 'safeguarding and protecting is everybody's responsibility' and 'a child-centred approach' :

Prevention (positive College atmosphere, careful and vigilant teaching, pastoral care, support to students, providing good adult role models).

Protection (following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns).

Support (to students and College staff and to children who may have been abused).

Safer Recruitment: The College complies with the requirements made by government guidance. The College has a Safer Recruitment policy, which enhances the safer recruitment programme, and a staff behaviour policy, which details the expectations of staff behaviour.

To contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies and Colleges

Contextual Safeguarding

CSFC Cambridge understands that it operates within a specific context and environment and that its safeguarding practices reflect this. The college recognises the importance of understanding specific wider risks posed by the wider environment in which students operate such as peer group dynamics, the physical location of the school and boarding house, as well as increasing online risks.

The College recognises that children may experience abuse, exploitation and other forms of harm in contexts outside their families. Extra-familial harm can take a variety of forms and children may be vulnerable to multiple and overlapping harms, including sexual abuse and exploitation, domestic abuse within their own intimate relationships, criminal exploitation, financial exploitation, serious youth violence, county lines activity and radicalisation. Staff should remain alert to the contexts in which harm may occur, including peer groups, intimate relationships, the local community and online environments, and should share relevant contextual information when reporting safeguarding concerns.

CSFC Cambridge accepts that as a predominantly international boarding school with many students who speak English as a second language, these students may be especially vulnerable. CSFC Cambridge has implemented extra procedures to ensure the safety and well-being of these students such as close supervision from trained houseparents and a 24 hour on-call safeguarding team. These procedures are detailed within the safeguarding policy below.

This policy has been developed in accordance with the principles established in the following guidance and acts, and in accordance with guidance published by the Cambridge & Peterborough Partnership Safeguarding Children Partnership.

- Education Act 2002 (Sections 157 & 175)
- Children Act 1989 and 2004
- Education (Independent School Standards) Regulations 2014
- Working Together to Safeguard Children (HM Government, 2026)
- Keeping Children Safe in Education (DfE, September 2026)
- What to do if you are worried a child is being abused (HM Government, 2015)
- Prevent Duty Guidance (2023)
- Counter-Terrorism and Security Act 2015
- Equality Act 2010
- RSE statutory guidance (2019, updated references 2022)

This policy is available on the college website and as a printed copy on request.

The Safeguarding Policy should be read alongside and in conjunction with the Anti-Bullying, Health and Safety, Restrictive Interventions and Use of Reasonable Force, Whistleblowing and Recruitment policies. Together these constitute the suite of policies to safeguard and promote the welfare of students in CSFC Cambridge.

- If a concern is brought to you concerning a student, you must bring it to the attention of the DSL or the Deputy DSLs immediately.
- If a concern or allegation is brought to you concerning a member of staff, including supply staff, trainee teachers, volunteers or contractors, you must bring it to the attention of the Principal immediately. The Principal will consider whether onward referral to the Local Authority Designated Officer (LADO) is required. Where there is a conflict of interest in reporting the matter to the Principal, the concern should be reported directly to the LADO.
- If a concern is brought to you concerning the Principal, you must bring it to the attention of the nominated Governor with responsibility for Safeguarding, Paul Ludlow, immediately and the Principal should not be informed.
- If a concern is brought to you concerning a Governor, you must bring it to the attention of the Principal immediately.

Safeguarding incidents may happen anywhere both onsite and away from college and staff should be alert to the possibility of concerns being raised at college. At CSFC Cambridge we will ensure

that we have appropriate procedures in place for responding where we believe that a child has been abused or is at risk of abuse. The procedures also cover circumstances in which a member of staff is accused of, or suspected of, abuse, including enabling staff to raise concerns about low level behaviours of adults.

At CSFC Cambridge we understand that promoting the welfare of children is everyone's responsibility. Everyone has a role to play in safeguarding young people. This means that all staff should consider, at all times, what is in the best interests of the young person. As a College we recognise the additional vulnerability of students with SEND, those who are living away from home and those who speak English as an additional language.

College staff are expected to read and understand the following documents and to understand their role in keeping the young people in our care safe.

- The College Staff Code of Conduct
- Keeping Children Safe in Education, Part One (DfE, September 2026)

College staff are made aware of the following and the annual safeguarding refresher training includes reference to this.

- What to do if you're worried a child is being abused: Advice for practitioners (March 2015)
- The Prevent Duty: Departmental advice for schools and child care providers (2023)
- Safeguarding team members must read all of Keeping Children Safe in Education (Sept 2026)
- Safeguarding team members and SLT must read Working Together to Safeguard Children (March 2026)
- Boarding and Pastoral staff must read National Minimum Standards for Boarding Schools May 2026

Through their day-to-day contact with students and direct work with families, all CSFC Cambridge staff have a responsibility to:

- Understand that safeguarding and promoting the welfare of children is everyone's responsibility
- Maintain an attitude of "it could happen here"
- Identify concerns early to prevent them from escalating
- Provide a safe environment in which students can learn
- Identify young people who may benefit from support before statutory intervention, including universal services, community-based Early Help or Family Help.
- Know what to do if a young person discloses abuse or neglect

- Follow the college's referral procedures without delay
- Record concerns accurately, factually and promptly
- Understand the role of the Designated Safeguarding Lead (DSL) and deputies
- Know how to report low-level concerns regarding adults' behaviour
- Understand the process for reporting safeguarding concerns or allegations about staff and other adults working with children, including the appropriate route where there is a conflict of interest.
- Understand the safeguarding risks associated with online activity and the college's filtering and monitoring systems
- Be aware of specific safeguarding issues including child-on-child abuse, sexual violence and harassment, exploitation, serious violence, radicalisation, mental health concerns and attendance-related risks

This policy sets out how the College's Governors discharge their statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at the College, in accordance with:

- Keeping Children Safe in Education (DfE, September 2026)
- Working Together to Safeguard Children (HM Government, 2026)
- Education Act 2002 (Sections 157 and 175)

This policy applies to:

- All staff, paid and unpaid
- Governors and proprietors
- Volunteers
- Agency and supply staff
- Trainee teachers
- Contractors
- Visiting professionals

Support staff, social organisers, receptionists, office staff as well as teachers may be the first point of disclosure for a child. Concerned parents or carers may also contact the College and its Governors.

The College works in partnership with external agencies and is committed to multi-agency safeguarding arrangements.

This policy is consistent with the procedures of the Cambridgeshire and Peterborough Safeguarding Children Partnership and reflects local thresholds for intervention.

2.0 Types of Abuse

All staff should be aware that **abuse, neglect, exploitation and safeguarding issues** are rarely standalone events and cannot always be covered by one definition or label. In most cases, multiple issues will overlap.

Abuse is categorised under four main headings:

- **Physical Abuse**
- **Emotional Abuse**
- **Sexual Abuse**
- **Neglect**

These categories are defined in *Keeping Children Safe in Education (DfE, September 2026)* and may present through a range of physical and behavioural indicators.

Staff should also be alert to specific safeguarding issues, including but not limited to:

2.1 Specific Safeguarding Issues

(As identified in, *Keeping Children Safe in Education*, September 2026)

Staff should be aware of the following specific safeguarding issues. This list is not exhaustive and should be read alongside the full statutory guidance.

1. Child-on-child abuse
Including sexual violence and sexual harassment between children, upskirting, and the consensual and non-consensual making or sharing of nudes and semi-nudes.
2. Child criminal exploitation (CCE)
(Including county lines and cyber-enabled exploitation.)
3. Child sexual exploitation (CSE)
4. Domestic abuse
(Including exposure to domestic abuse within the family home.)
5. Homelessness

6. So-called honour-based abuse
(Including female genital mutilation (FGM) and forced marriage.)
7. Preventing radicalisation
(Extremism and terrorism; referral to Channel where appropriate.)
8. Serious violence
(Including gang involvement and weapon-related risks.)
9. Mental health concerns
(Where mental health difficulties may indicate safeguarding risk.)
10. Online safety
(Including online abuse, grooming, exploitation, exposure to harmful content, and risks associated with generative AI.)
11. Children missing education
12. Children missing from home or care
13. Modern slavery and human trafficking
14. Private fostering arrangements
15. Cybercrime

Staff should be aware that abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Sexual abuse of children may be perpetrated by other children. All child-on-child abuse will be taken seriously and managed in line with this policy.

Children with SEND

Staff must recognise that children with special educational needs and disabilities (SEND), or certain medical or physical health conditions, can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These may include:

- assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the child's condition without further exploration;
- increased vulnerability to exploitation;
- being more prone to peer-group isolation or bullying, including prejudice-based bullying;
- being disproportionately affected by behaviours such as bullying without outwardly showing signs;
- communication barriers and difficulties in managing or reporting concerns;
- a risk that the child may not understand that what is happening to them is abuse;
- the need for intimate care or isolation from others;

- increased dependence on adults for care; and
- difficulties with cognitive understanding, including distinguishing between fact and fiction in online content, understanding the consequences of repeating online content or behaviours, or recognising associated risks.

Staff with concerns about a student with SEND or certain health conditions must report these to the DSL or a Deputy DSL without delay. Any reports of abuse involving a student with SEND will require close liaison between the DSL or Deputy DSL and the SENCO or other person with oversight of SEND within the College. The College will consider whether additional pastoral support, attention or communication support is required.

Professional Curiosity

The signs and symptoms listed in this policy may be indicators of abuse; however, children may exhibit one or more of these signs for other reasons. Staff should exercise professional curiosity and never assume a benign explanation without further consideration.

Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and may not recognise their experiences as harmful. This should not prevent staff from exercising professional curiosity and speaking to the DSL or a Deputy DSL where they have concerns.

Any concerns, however small, must be reported immediately to a Designated Safeguarding Lead.

Definitions of the forms of abuse according to Keeping Children Safe in Education are given below:

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse.

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or

hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

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. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the College's policy and procedures for dealing with it.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs and symptoms

Everyone should be aware of the signs and symptoms as given by the NSPCC and report any concerns.

Physical signs of abuse may include

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- kicking, slapping, pulling hair (think child-on-child abuse)
- scalds, with upward splash marks,
- multiple burns with a clearly demarcated edge

Changes in behaviour that can indicate physical abuse include

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example in hot weather
- depression
- withdrawn behaviour

- running away from home

Changes in behaviour which can indicate emotional abuse include

- neurotic behaviour eg sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress

Physical signs of sexual abuse may include

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse include

- sudden or unexplained changes in behaviour eg becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults

Physical signs of neglect may include

- constant hunger, sometimes stealing food from other children
- constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate clothing for the conditions

Changes in behaviour which can also indicate neglect may include

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

The above signs and symptoms may or may not be because of child protection/safeguarding issues but should be a consideration.

2.3 Child-on-Child Abuse

See page 24.

2.4 Child Criminal Exploitation (CCE)

(Including County Lines)

Child Criminal Exploitation (CCE) is where an individual or group exploits an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity for the benefit of the perpetrator or in exchange for something the child needs or wants. This may be facilitated through violence, threats or other forms of coercion.

CCE may be carried out by individuals, organised criminal networks or gangs. Children who are criminally exploited should be recognised as victims. They cannot consent to their own exploitation and may not recognise that they are being exploited.

CCE may include county lines activity, transporting drugs or money, shoplifting, vehicle crime, working in cannabis factories, carrying weapons or committing serious violence.

Criminal exploitation may also constitute modern slavery or human trafficking. Where CCE is suspected, the DSL will follow child protection procedures and make appropriate referrals.

County Lines

County lines is a form of criminal exploitation in which gangs and organised criminal networks export illegal drugs into one or more importing areas using dedicated mobile phone lines or other forms of “deal line”. Children may be exploited to move, store or sell drugs and money and may be subjected to coercion, intimidation, violence, including sexual violence, and other forms of abuse.

Indicators may include:

- Unexplained gifts or possessions
- Association with other young people involved in exploitation
- Changes in emotional well-being
- Misuse of drugs and alcohol
- Missing episodes (home or school)
- Regular absence from education

A referral to the National Referral Mechanism (NRM) should be considered where appropriate.

2.5 Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of child sexual abuse where an individual or group exploits an imbalance of power to coerce, manipulate or deceive a child into sexual activity for the benefit of the perpetrator or in exchange for something the child needs or wants.

CSE may occur over time or as a one-off incident, with or without the child's immediate knowledge, and may be committed by an individual or an organised network. It can occur online or offline and without physical contact.

Any child can be affected, including 16- and 17-year-olds who can legally consent to sexual activity. Children may not recognise that they are being exploited and may believe they are in a genuine relationship.

Where CSE is suspected, the DSL will follow child protection procedures and make appropriate referrals.

Indicators may include:

- Unexplained gifts or possessions
- Association with other young people involved in exploitation
- Older partners
- Sexually transmitted infections or pregnancy
- Changes in emotional well-being
- Drug and alcohol misuse
- Missing episodes
- Persistent absence from education

2.6 Domestic Abuse

Domestic abuse can encompass psychological, physical, sexual, financial or emotional abuse. It may be a single incident or a pattern of behaviour.

Children may:

- Witness abuse
- Experience the effects of abuse
- Suffer domestic abuse within their own intimate relationships

Exposure to domestic abuse can have a serious and long-lasting impact on children. Children are recognised as victims of domestic abuse in their own right where they see, hear or experience its effects.

Domestic abuse may also occur within intimate relationships between young people. Where concerns arise, these will be managed as child-on-child abuse and safeguarding procedures will be followed.

The College recognises initiatives such as Operation Encompass. Operation Encompass notifications do not replace the College's safeguarding procedures or the need to make referrals to Children's Social Care where appropriate.

2.7 Homelessness

Although unlikely in the College's context, the College recognises that homelessness or the risk of homelessness may present a safeguarding risk and increase a child's vulnerability to abuse, neglect or exploitation.

Any concerns should be reported to the DSL or a Deputy DSL without delay. Where appropriate, the DSL will work with the local authority and other relevant agencies. Referral to the Local Housing Authority does not replace a referral to Children's Social Care where a child has been harmed or is at risk of harm.

2.8 Honour or Faith Based Abuse

(Including FGM and Forced Marriage)

Honour or faith-based abuse includes incidents or crimes committed to protect or defend the perceived honour of a family or community, or abuse linked to beliefs about faith, culture or family reputation. It includes:

- Female Genital Mutilation (FGM)
- Forced marriage
- Breast ironing

HBA may involve multiple perpetrators and extended family pressure.

All forms of HBA are abuse and must be treated as such.

Concerns must be reported to the DSL immediately.

Female Genital Mutilation (FGM)

FGM comprises procedures involving partial or total removal of the external female genitalia or injury for non-medical reasons. It is illegal in the UK and a form of child abuse.

Teachers have a **mandatory reporting duty** under Section 5B of the Female Genital Mutilation Act 2003 to report to the police where they discover that FGM appears to have been carried out on a girl under 18.

Teachers must not examine pupils but must report disclosure or visual evidence.

Forced Marriage

Forced marriage is illegal in England and Wales. It occurs where one or both parties do not consent to the marriage and pressure or abuse is used. It is also illegal to carry out any conduct for the purpose of causing a child to marry before their eighteenth birthday, even where coercion is not used.

All concerns must be shared with the DSL immediately.

2.9 Preventing Radicalisation

Children may be susceptible to extremist ideology and radicalisation into terrorism. The College is subject to the Prevent Duty under Section 26 of the Counter-Terrorism and Security Act 2015, which forms part of its wider safeguarding responsibilities.

Staff should remain alert to behaviours or indicators that may suggest a child is vulnerable to radicalisation and report any concerns to the DSL or a Deputy DSL without delay.

The DSL and Deputy DSLs are familiar with local Prevent referral procedures and will make referrals where appropriate. Prevent referrals may be considered through the multi-agency Channel programme, which provides voluntary early intervention and support for individuals at risk of being drawn into terrorism.

2.10 Serious Violence

Serious violence is a safeguarding concern and may include physical assault, the carrying or use of weapons, or violence associated with criminal exploitation.

Staff must report any concerns about a child carrying or using a weapon, or expressing an intention to do so, to the DSL or a Deputy DSL immediately. The DSL will assess the risk, implement appropriate safeguarding measures and make referrals where necessary.

Staff should be alert to indicators that may suggest a child is at risk of, or involved in, serious violence, including:

- increased absence from education;
- changes in peer groups or relationships;
- a decline in academic performance;
- signs of self-harm or changes in wellbeing;
- unexplained injuries; and
- unexplained gifts, possessions or money.

Children involved in serious violence may themselves be victims of abuse or exploitation. Where concerns arise, the College will provide appropriate safeguarding support and work with relevant agencies where necessary.

2.11 Mental Health

Mental health problems can, in some cases, become safeguarding concerns and may also indicate that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

College staff are well placed to identify changes in behaviour that may indicate a student is experiencing mental health difficulties. Staff should not attempt to diagnose mental health conditions but should report concerns to the DSL or a Deputy DSL.

Warning signs may include:

- significant changes in behaviour;
- withdrawal from friends or activities;
- ongoing sleep difficulties;
- self-harm or self-neglect;
- eating disorders; or
- suicidal thoughts or behaviours.

Students may access support through the College's pastoral, counselling and nursing services. Where a mental health concern is also a safeguarding concern, staff must follow the College's safeguarding procedures without delay. If a student is believed to be at immediate risk of harm, emergency services should be contacted immediately.

2.12 Online Safety

See page 26

2.13 Children Missing Education

Children who are absent from education for prolonged periods or on repeated occasions, and children missing education, may be at increased risk of abuse, neglect, exploitation or other safeguarding concerns.

Staff must follow the College's attendance procedures and report any safeguarding concerns arising from absence to the DSL or a Deputy DSL without delay.

Where a child is missing from education, the DSL will assess the level of risk and take appropriate action, including referrals to external agencies where required. Separate regulatory reporting requirements also apply to sponsored international students.

2.14 Children Missing from Home or Care

Although unlikely in the College's context, the College recognises that children who go missing from home or care may be at increased risk of abuse, exploitation or other harm.

Any concerns must be reported immediately to the DSL or a Deputy DSL, who will work with relevant agencies as appropriate.

2.15 Modern Slavery and Human Trafficking

Modern slavery includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation may include sexual exploitation, criminal exploitation, forced labour or other forms of abuse.

Modern slavery and trafficking are forms of child abuse. Where a child is identified as a potential victim, the DSL or a Deputy DSL will follow appropriate child protection procedures and consider referral through the National Referral Mechanism and to other relevant agencies.

2.16 Private Fostering

Although highly unlikely in the College's context, the College understands that private fostering arrangements may present additional safeguarding risks.

Where the College becomes aware that a student under the age of 16 (or under 18 if disabled) may be living in a private fostering arrangement, the matter must be reported immediately to the DSL or a Deputy DSL. The DSL will notify the local authority where required.

2.17 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either cyber-enabled crime, where existing crimes are enabled at greater scale or speed through technology, or cyber-dependent crime, which can only be committed through the use of computers or computer networks.

The College recognises that students may be vulnerable to involvement in cyber-dependent crime, including offences such as hacking, unauthorised access to computer systems, distributed denial of service (DDoS) attacks, phishing, online fraud or the creation and distribution of malicious software.

In line with *Keeping Children Safe in Education*, staff should be aware that students with particular technical skills or interests may be at risk of exploitation, coercion or manipulation by others, including online networks. Cybercrime may present as a safeguarding concern where there is evidence of exploitation, criminal coercion, association with organised groups or wider vulnerability.

Any concerns regarding potential involvement in cyber-dependent crime must be reported without delay to the Designated Safeguarding Lead (DSL). The DSL will assess the level of risk and consider appropriate action, which may include Family Help or other early support, parental engagement, referral to external agencies, consideration of referral to the Cyber Choices programme, or liaison with the police where a criminal offence may have been committed.

The College will provide age-appropriate education regarding the legal, personal and safeguarding risks associated with cyber activity and promote responsible and lawful use of technology.

2.18 Children who are LGBT or Gender Questioning

Children who are lesbian, gay, bisexual or who are questioning their gender identity are not inherently at greater risk of harm; however, such children, or those perceived to be LGBT, may be at increased risk of bullying, discrimination, or social isolation.

The College recognises its duties under the Equality Act 2010 and is committed to providing a safe, respectful and inclusive environment for all students.

The College acknowledges that gender questioning can, in some cases, be associated with wider vulnerabilities, including mental health needs, neurodiversity, family circumstances or social pressures. Staff will respond with sensitivity, professional curiosity and without making assumptions.

Staff should recognise that a student's sexual orientation or gender questioning is not, in itself, a safeguarding concern. Any safeguarding concerns should be considered on an individual basis, taking account of the student's circumstances, wishes and feelings, age and understanding, and any wider vulnerabilities or risks.

Any safeguarding concerns will be managed in line with this policy and in accordance with:

- Keeping Children Safe in Education (DfE, September 2026)
- Working Together to Safeguard Children (2026)

The College will:

- Take an individualised approach to each student
- Work in partnership with parents or carers, except where doing so would place a child at risk of significant harm
- Seek appropriate external advice where necessary
- Ensure students have access to trusted adults within the College
- Act promptly to address bullying or discriminatory behaviour

The welfare of the child remains paramount.

2.19 Children of families in Prison

The College recognises that children who have a parent or close family member in prison may experience significant emotional distress, stigma, financial hardship or instability, and may be at increased risk of safeguarding concerns. Parental imprisonment is recognised as an adverse childhood experience and can impact a child's behaviour, attendance, attainment and mental health. Staff should respond with sensitivity and avoid making assumptions about a child's circumstances. Where concerns arise, these must be reported to the Designated Safeguarding Lead (DSL), who will consider appropriate support, including universal or community-based

support, Early Help, Family Help or referral to other agencies where necessary. The College will work in partnership with families and relevant services to ensure appropriate pastoral and safeguarding support is in place.

3.0 Equality and Diversity

The Senior Management Team is responsible for ensuring that the College operates within the legal framework of the Equality Act 2010 and that safeguarding arrangements reflect the needs of all students, including those with protected characteristics.

Safeguarding arrangements take account of students' age, disability, sex, race, religion or belief, sexual orientation and gender reassignment, and any additional vulnerabilities.

Full details are set out in the College's Equality and Diversity Policy.

3.1 Support before Statutory Intervention: Early Help and Family Help

Any child may benefit from support before statutory intervention, including universal services and community-based Early Help, or the targeted early help level of Family Help.

All staff should be alert to the potential need for additional support for any child. Particular attention should be paid to children who:

- are disabled or have additional needs;
- have special educational needs (whether or not they have an Education, Health and Care Plan);
- are young carers;
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement or association with organised crime groups;
- are frequently missing from education, home or care;
- are at risk of exploitation, including child criminal exploitation, child sexual exploitation, modern slavery or trafficking;
- are at risk of radicalisation;
- are experiencing mental health difficulties;
- are misusing drugs or alcohol;
- are pregnant or are young parents;
- are showing early signs of abusive, violent or harmful behaviour towards others;
- have experienced repeated removals from the classroom, multiple suspensions or are on a part-time timetable;
- are living in family circumstances presenting challenges, such as substance misuse, adult mental ill health, domestic abuse or parental imprisonment; or
- are at risk of honour or faith-based abuse, including forced marriage or female genital mutilation.

Staff who identify an emerging need or concern should discuss this with the DSL or a Deputy DSL. The College may provide support internally through its pastoral, boarding and wellbeing systems and may also work with families and external agencies to access Early Help services.

Where a child or family has multiple or complex needs requiring more targeted support, a referral to Family Help may be appropriate. Family Help is coordinated by the local authority and/or its partners and is a voluntary service requiring the family's consent.

The DSL and Deputy DSLs will be familiar with local Early Help and Family Help processes, threshold guidance and referral pathways.

3.2 Child in Need

Family Help includes both targeted early help and support and services delivered under section 17 of the Children Act 1989.

A child in need is defined under Section 17 of the Children Act 1989 as a child who:

- is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services; or
- whose health or development is likely to be significantly impaired without the provision of services; or
- is disabled.

3.3 Child Protection and Risk of Significant Harm

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral must be made to local authority Children's Social Care. Section 47 of the Children Act 1989 places a duty on the local authority to make enquiries to determine whether action is required to safeguard and promote the child's welfare.

Significant harm may arise from abuse, neglect or exploitation and may result from a single traumatic event or from a pattern of behaviour or circumstances over time.

In safeguarding practice, risk may arise from:

- Direct abuse or neglect
- Exposure to domestic abuse
- Exploitation (criminal or sexual)
- Serious violence
- Online harm
- Radicalisation
- Harmful sexual behaviour

- Other contextual or environmental risks

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the Designated Safeguarding Lead will refer the matter to children's social care in accordance with statutory guidance.

The welfare of the child is paramount in all decision-making

4.0 Roles and Responsibilities of the DSL

The CSFC Cambridge Designated Safeguarding Lead (DSL) has lead responsibility for safeguarding and child protection across the College, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL is also the Prevent Lead and Online Safety Lead.

The DSL will:

- Manage referrals to local authority children's social care, the police, Channel and other relevant agencies, and support staff who make referrals where appropriate.
- Refer promptly cases of suspected abuse, neglect or exploitation to local authority children's social care as required.
- Liaise, as required, with the case manager and the Local Authority Designated Officer (LADO) in relation to safeguarding concerns or allegations concerning staff or other adults working with children.
- Make referrals to the Disclosure and Barring Service and/or Teaching Regulation Agency where appropriate.
- Liaise with the Principal regarding safeguarding issues, particularly ongoing Section 47 enquiries and police investigations, and be aware of the requirement for children to have an Appropriate Adult where applicable.
- Act as a source of support, advice and expertise to all staff.
- Act as a point of contact with safeguarding partners and liaise with relevant external agencies.
- Liaise with relevant College staff, including teachers, pastoral and boarding staff, the Nursing Team, IT staff, the senior mental health lead and the person with oversight of SEND, so that students' needs are considered holistically.
- Liaise with the senior mental health lead and relevant mental health services where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents and carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Ensure safeguarding records and child protection files are accurate, factual, secure, up to date and managed in accordance with statutory guidance and data protection legislation.

- Ensure that decisions and actions taken in relation to safeguarding concerns are appropriately recorded, including the rationale for decisions.
- Ensure staff receive appropriate safeguarding training and updates.
- Oversee the College's filtering and monitoring strategy.
- Promote a culture of vigilance and professional curiosity.
- Contribute to safeguarding reporting to Governors while maintaining appropriate confidentiality.
- Work with the Principal and relevant strategic leads to promote the educational outcomes of children who have, or have had, a social worker, recognising the impact that safeguarding and welfare issues may have on attendance, engagement and achievement.

The DSL will seek advice from local safeguarding partners where appropriate

DSL Availability and Cover Arrangements

During term time, the DSL or a Deputy DSL will always be available during College hours for staff to discuss safeguarding concerns. The College will also maintain appropriate safeguarding cover arrangements for out-of-hours and out-of-term activities.

Robust cover arrangements will be maintained for periods when the DSL is unavailable due to illness, leave or other circumstances. Staff will be made aware of the arrangements for raising concerns in the DSL's absence. The College will maintain a clear and reliable system to ensure that safeguarding concerns are received, monitored and acted upon without delay.

Training

The DSL will receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, eg through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a Child Protection case conference and a Child Protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands this Safeguarding Policy and procedures, especially new and part time staff
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the college may put in place to protect them
- Deputy DSLs are trained to the same standard as the DSL. Safeguarding activities may be delegated to appropriately trained Deputy DSLs, but ultimate lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

Raising awareness – the DSL should

- Ensure the College's policies are known and used appropriately
- Ensure the College's Safeguarding Policy is reviewed annually; the procedures and implementation are updated and reviewed regularly, and work with our governing body regarding this
- Carry out an annual review for the governing body to assist them in their proprietorial oversight
- Ensure the Safeguarding Policy is available publicly and parents/guardians are aware that referrals about suspected abuse or neglect may be made and the role of the College in this
- Link with Cambridge & Peterborough Partnership Safeguarding Board to make sure staff are aware of training opportunities and the latest local policies on Safeguarding
- Where a student leaves the College ensure their Safeguarding/Child Protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

Procedures (making a referral)

Dealing with a disclosure from a student is likely to be a stressful experience. The member of staff concerned should consider seeking support for him or herself and discuss this with one of our designated DSLs.

If a member of staff has a concern that is in anyway related to a safeguarding issues it should be reported to or discussed with one of the DSLs. It should not be discussed with any other member of staff.

The member of staff must record information regarding the concern the same day. The record must be clear, precise, factual account of the observations. CPOMs must be used. One of our designated DSLs will decide whether the concerns should be referred to Cambridge Children Social Care.

If one of the DSLs decides that a referral should be made to Children's Social Care, where a child has suffered or is at risk of suffering significant harm, it will be made immediately. Parents/Guardians will be notified if a referral is made unless that would put the child at greater risk. There is not a requirement to get parental consent for referrals to statutory agencies, but the college will always aim to do so if the circumstances allow.

If the safeguarding team is unavailable for any reasons and beyond contact, staff have a duty to report any concerns directly to Cambridge Social Care or the Police.

A referral to Cambridge Social Care is normally done via the on-line reporting form
<https://safeguardingcambspeterborough.org.uk/concerned/professionals-reporting-a-concern/>

Details of local reporting thresholds can be found here:
<https://www.safeguardingcambspeterborough.org.uk/children-board/professionals/procedures/threshold-document/>

Staff should recognise the distinction between children who may benefit from additional support and children who have suffered harm or are at risk of harm. Staff are not expected to make formal assessments of need or determine statutory thresholds themselves. Concerns should be reported to the DSL or a Deputy DSL, who will consider the appropriate level of response in accordance with local threshold guidance and referral procedures.

Support may be provided internally by the College, through universal services or community-based Early Help, through the targeted early help level of Family Help, or through statutory services under the Children Act 1989. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral must be made to local authority Children's Social Care without delay.

5.0 Dealing with a disclosure (any form of abuse or concern)

If a student discloses that he or she has been abused in some way, the member of staff should:

- listen carefully to what is being said without displaying shock or disbelief
- ensure that the student is never given the impression that they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment, or made to feel ashamed for making a report;
- allow the student to talk freely
- reassure the student, but not make promises which they may not be able to keep
- never promise confidentiality, as it may be necessary to refer the information onwards
- reassure the student that what has happened is not their fault
- stress that it was the right thing to tell
- listen, rather than ask direct questions
- never ask leading questions; if possible avoid asking questions. Ask open questions if more information needed.
- not criticise the perpetrator
- explain what has to be done next and to whom this must be told

The student's wishes and feelings should be listened to and taken into account when determining what action to take and what support to provide. The College will seek to understand how the student wishes to proceed, while making clear that the College may need to take action to safeguard the student or others even where this is not the student's preferred course of action.

Record Keeping

Accurate, secure and contemporaneous record keeping is an essential part of safeguarding practice.

When a student makes a disclosure, or when a safeguarding concern is observed or raised, the member of staff must:

- Record the concern directly onto CPOMS as soon as possible on the same day.
- If CPOMS is not immediately accessible, make brief, factual handwritten notes as soon as possible and upload these to CPOMS at the earliest opportunity.

- Record the student's own words verbatim wherever possible.
- Record any observable non-verbal behaviour.
- Record factual observations rather than interpretations or assumptions.
- Use a body map to indicate the position of visible injuries where appropriate (no member of staff will examine intimate areas of the body).
- Sign and date all records.

All safeguarding records are:

- Reviewed and actioned by a Designated Safeguarding Lead (DSL).
- Stored securely and separately from the main student file.
- Managed in accordance with data protection legislation.
- Transferred securely if a student moves setting.

The DSL is responsible for maintaining accurate chronologies and ensuring safeguarding records are complete, secure and up to date.

Safeguarding records must be detailed, accurate, secure and kept up to date. Records should include concerns, discussions held, decisions made, actions taken and the rationale for decisions. This includes decisions to make, or not to make, referrals to Children's Social Care, Prevent or other agencies.

Safeguarding records are confidential and access is restricted to those who require the information for safeguarding purposes. Information will be shared internally and externally on a need-to-know basis and in accordance with safeguarding requirements and relevant data protection legislation

6.0 Safeguarding Concerns or Allegations about Staff, Supply Teachers, Trainee Teachers, Volunteers and Contractors

This section applies to safeguarding concerns or allegations 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;
- behaved towards a child or children in a way that indicates that they may pose a risk of harm to children; or

- behaved or may have behaved in a way that indicates that they may not be suitable to work with children.

This applies to all staff, including supply staff and trainee teachers, volunteers and contractors, whether working in the College or in circumstances outside the College where transferable risk may need to be considered.

The Principal will refer immediately and within 24 hours to the Local Authority Designated Officer/Team (LADO) at Cambridge Council

- Email: LADO@cambridgeshire.gov.uk
- Telephone: 01223 727 967 (Monday to Friday during office opening hours)
- Telephone: 01733 234 724 (Emergency Duty Team - out of hours queries)

If information has been received that may constitute an allegation the LADO will preside over the investigation.

The Principal should not make his decision over what may appear to be a borderline case but should make a referral to the LADO team.

Where a safeguarding concern or allegation relates to a supply teacher, trainee teacher or member of contracted staff, the College will follow its safeguarding procedures and will not cease to use the individual's services solely because of the concern or allegation. The College will take the lead in determining the facts and liaising with the LADO where appropriate, while working closely with the individual's employing agency, training provider or other third-party organisation. The College and the relevant third-party organisation share responsibility for ensuring that allegations are dealt with properly and that children are safeguarded.

Where a member of boarding staff is suspended pending an investigation of a Safeguarding/Child Protection nature, arrangements for alternative accommodation away from students will be made. Any person, whether employed, contracted, supply staff, a volunteer or student, who is no longer at the College because they are considered unsuitable to work with children, will be reported to the Disclosure and Barring Service (DBS) within one month of leaving the College. Furthermore, the College will notify the Teaching Regulation Agency of the details of any teacher who has been dismissed or left the College where there are concerns that a prohibition order may be appropriate.

Transferable risk from incidents arising outside of school where a member of staff has behaved or may have behaved in a way that indicates that the person may not be suitable to work with children (for example, involving domestic violence) should be considered by school leaders. All staff should be aware of their duty to raise concerns about the attitude and actions of colleagues.

6.1 Low Level Staff Concerns

The safety and wellbeing of children in the College depends on the vigilance of all staff and the prompt sharing of concerns, no matter how small, about any adult working in or on behalf of the College. The term "low-level" does not mean that a concern is insignificant. A low-level concern is any concern, no matter how small and even if no more than a sense of unease or a "nagging doubt", that an adult may have acted in a way that is inconsistent with the Staff Code of

Conduct, including inappropriate conduct outside work, but which does not meet the harm threshold or is otherwise not serious enough to consider referral to the LADO.

The sharing with the Principal of concerns about staff practice is a vital part of the college's ability to create and embed a culture of openness, trust and transparency.

If a concern is raised with the Principal regarding a low level concern. The Principal will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. Reports of low-level concerns should be recorded in writing, with details of the concern, the context, and action taken.

The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.

The college is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the college setting. The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation found to be substantiated.

Records of low-level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. Where a pattern of behaviour is identified, the college will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO. The rationale for all decisions and actions taken will be recorded. The recording of any low level concern will be separate from staff files unless an issue moves from being a low level concern to a full concern about a member of staff.

Low level concerns about supply staff or contractors will be shared with the company/agency and recorded in college.

If there is a low level concern involving the Principal, the Safeguarding Governor should be contacted.

Staff Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct'. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care.

A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

Our low-level concern policy

The overarching aim of the college's Low-Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive, and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What is a low-level concern?

A low-level concern is any concern that an adult has acted in a way that:

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

A low-level concern for this purpose is any safeguarding allegation, or concern (no matter how small), about staff members (including supply staff, volunteers, and contractors). Even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the college's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

Low-Level Concerns about self (self-reporting)

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the college sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Low-Level Concerns about an adult

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a Low-Level Concern.

What should I do if I have one?

Where a low-level concern exists, it should be reported to the Principal. Unless it is regarding the Principal themselves, in which case it should be reported to the safeguarding governor, within 24 hours of becoming aware of it (Where the concern relates to a particular incident).

How will my low-level concern be handled?

The Principal will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure outlined in the safeguarding policy.

The circumstances in which a low-level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation
- b) there is a pattern of low-level concerns which collectively amount to an allegation or
- c) there is other information which when taken into account leads to an allegation.

Where the Principal is in any doubt whatsoever, advice will be sought from the Safeguarding Governor, if necessary, on a no-names basis. Having established that the concern is low-level, the DSL/Principal as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability, or disciplinary procedure.

7.0 Procedures for Dealing with Child-on-Child Abuse

Child-on-Child Abuse

The College recognises that children can abuse other children and that this can occur inside or outside the College, including within boarding provision and online. Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator and will never be dismissed as "banter", "part of growing up", "just having a laugh" or "boys being boys".

Staff should maintain an attitude of *"it could happen here"* and recognise that early identification and intervention are essential in preventing harmful behaviour from escalating.

Child-on-child abuse may occur between children of any age or sex and may involve individuals or groups. It can take place face-to-face or online and includes, but is not limited to:

- bullying, including cyberbullying and prejudice-based bullying;
- abuse within intimate personal relationships between children;
- physical abuse;
- serious violence, including the use or threat of weapons;
- harmful sexual behaviour (HSB);
- sexual harassment and sexual violence;
- causing another child to engage in sexual activity without consent;
- the making or sharing of nudes and semi-nudes;
- upskirting; and

- hazing or initiation-type abuse.

Prevention

The College adopts a whole-college approach to preventing child-on-child abuse by:

- promoting a culture of respect, equality and inclusion;
- educating students about healthy relationships, consent, online safety and respectful behaviour;
- ensuring students know how to report concerns and access trusted adults;
- challenging inappropriate behaviour at an early stage;
- monitoring safeguarding, behaviour and pastoral information to identify emerging risks; and
- providing appropriate safeguarding training for staff.

Reporting and Response

All concerns about child-on-child abuse must be reported immediately to the DSL or a Deputy DSL.

Staff should act on concerns and should not wait for a child to make a direct disclosure. Concerns may arise through observations, changes in behaviour, information from another child or other indicators of possible harm.

Any child making a report will be listened to carefully, taken seriously and reassured that they will be supported and kept safe. They will never be made to feel they are creating a problem by making a report.

The DSL or Deputy DSL will lead the College's response and will:

- ensure the immediate safety and welfare of those involved;
- undertake and record an appropriate risk assessment;
- consider the wishes and feelings of the victim;
- consider the needs of the alleged perpetrator and any other affected children;
- implement appropriate safeguarding and support measures; and
- liaise with parents, Children's Social Care, the police and other agencies where appropriate.

Where there is reason to believe that a child is at immediate risk of harm, immediate safeguarding action will be taken.

Hazing

The College recognises hazing and initiation-type behaviour as a form of child-on-child abuse. Apparent participation does not necessarily indicate genuine consent, particularly where coercion, pressure or an imbalance of power exists.

Any concerns regarding hazing or initiation activities must be reported immediately to the DSL or a Deputy DSL.

Abuse within Intimate Relationships

Abuse may occur within intimate relationships between children and may include physical, emotional, psychological, sexual or online abuse.

Children may not recognise controlling or abusive behaviour within a relationship or may find it difficult to report. Any concerns will be managed as child-on-child abuse in accordance with this policy.

Bullying, including cyberbullying and prejudice-based bullying, may also constitute a safeguarding concern. Where appropriate, safeguarding procedures will be followed alongside the College's Behaviour and Anti-Bullying Policies.

Making or Sharing Nudes and Semi-Nudes

The making or sharing of nudes and semi-nudes involving anyone under the age of 18 requires a safeguarding response, whether the imagery is shared consensually or non-consensually.

This includes photographs, videos or other visual content that is self-generated, created by others or digitally altered, including AI-generated imagery.

Staff must:

- report the concern immediately to the DSL or a Deputy DSL;
- not view, copy, print, store or share the imagery; and
- not ask a child to forward or download the imagery.

The DSL or Deputy DSL will assess each incident on its individual circumstances, taking account of the nature of the imagery, the ages and vulnerabilities of those involved, consent, coercion, wider distribution and any ongoing safeguarding risks. Appropriate referrals will be made where necessary.

Sexual Harassment and Sexual Violence

Sexual harassment and sexual violence are unacceptable and will always be treated as safeguarding concerns.

Sexual harassment may include unwanted sexual comments, jokes, name-calling, online behaviour, unwanted physical contact or other conduct of a sexual nature. Sexual violence includes rape, assault by penetration and sexual assault.

The College recognises that harmful sexual behaviour exists on a continuum and that sexual harassment and sexual violence may not always be reported. Staff should remain alert to signs or patterns of behaviour that may indicate abuse.

Where a report is made, the DSL or Deputy DSL will undertake an immediate risk assessment, consider the needs of all children involved and implement appropriate safeguarding measures, working with Children's Social Care, the police or other agencies where required.

Supporting Children

The safety, welfare, wishes and feelings of the victim will always be central to the College's response.

Support will be tailored to the individual student and may include pastoral, boarding, nursing, counselling or academic support, reasonable adjustments to lessons or boarding arrangements, measures to minimise contact between students and referral to external specialist services.

The College will seek to minimise disruption to the victim's education and wider College experience.

The safeguarding and support needs of the alleged perpetrator will also be considered. Providing appropriate support does not diminish the seriousness of the behaviour or the support provided to the victim. Behavioural and disciplinary action may run alongside safeguarding interventions where appropriate.

The needs of any other children affected by or witnessing the abuse will also be considered.

Reporting Concerns

Students are encouraged to report any safeguarding concern, including child-on-child abuse, harmful sexual behaviour, sexual harassment, sexual violence, bullying, online abuse or the making or sharing of nudes and semi-nudes.

Concerns may be reported to any trusted member of staff, including the DSL or Deputy DSLs, Heads of House, Houseparents, teachers, the College Nurse or counselling staff.

Students are regularly reminded that concerns will be taken seriously and that they may report something that has happened to them, something they have witnessed or concerns about another student.

The College recognises that children may not always recognise abuse or feel ready to report it. Staff will therefore remain professionally curious and alert to changes in behaviour or other indicators of possible harm.

Where a student makes a report, staff will listen carefully, explain what will happen next and ensure that the concern is passed to the DSL or a Deputy DSL without delay. The student's wishes and feelings will be taken into account when considering appropriate action and support, whilst recognising that the College may need to act to safeguard the student or others.

8.0 Opportunities to Teach Safeguarding

The College recognises the important role that education plays in safeguarding and prevention. Students are taught how to keep themselves and others safe, including online, through PSHE, tutorials, assemblies, boarding programmes, enrichment activities, the wider curriculum and, where appropriate, external speakers.

Safeguarding education forms part of the College's whole-college approach and is reinforced through its values, Behaviour Policy, pastoral and boarding systems. Teaching is age and developmentally appropriate and, where necessary, adapted to meet the needs and vulnerabilities

of individual students, including those with SEND, those who have experienced abuse or exploitation and students requiring additional support.

The College's safeguarding programme includes, where appropriate:

- healthy and respectful relationships;
- consent, boundaries and positive relationship behaviours;
- equality, diversity, prejudice and discrimination;
- recognising abusive and controlling relationships;
- harmful sexual behaviour, sexual harassment and sexual violence;
- online safety, including the safe use of technology;
- the risks associated with nudes and semi-nudes, including AI-generated or digitally altered images;
- pornography, online misogyny and harmful online influencers;
- grooming, exploitation, radicalisation and extremism;
- misinformation, disinformation and conspiracy theories;
- cyberbullying, digital footprints and online privacy; and
- how and where to seek help or report concerns.

Safeguarding education extends beyond the formal curriculum and is reinforced through pastoral conversations, House meetings, boarding provision, assemblies and daily interactions with staff.

Safeguarding topics are delivered sensitively, recognising that some content may be personally relevant or distressing to individual students. Appropriate support will be provided where required.

The safeguarding curriculum is reviewed regularly to ensure it reflects emerging safeguarding risks, student needs and the College's safeguarding profile.

9.0 Online Safety, Filtering and Monitoring

The College recognises that online safety is an integral part of safeguarding. Children may be exposed to safeguarding risks online as well as face-to-face, and online and offline risks frequently overlap.

Online safety is embedded within the College's whole-college approach to safeguarding and is reflected in policies, curriculum planning, staff training, filtering and monitoring arrangements, and engagement with students and parents.

The College recognises the four categories of online risk:

- **Content** – exposure to illegal, inappropriate or harmful content.
- **Contact** – harmful online interaction, including grooming, exploitation and harmful use of generative AI.
- **Conduct** – online behaviour that causes or increases the risk of harm, including cyberbullying and the creation or sharing of explicit images.
- **Commerce** – risks associated with online gambling, phishing, scams and financial exploitation.

The College also recognises that generative artificial intelligence presents both educational opportunities and safeguarding risks. Its use will be managed in accordance with safeguarding, data protection and acceptable use requirements.

Filtering and Monitoring

The Safeguarding Governor, Paul Ludlow, who also acts as the Online Safety Governor ensures that appropriate filtering and monitoring systems are in place in accordance with *Keeping Children Safe in Education* (DfE, 2026).

The College adopts a risk-based approach to filtering and monitoring, recognising that no technical system can provide complete protection. Arrangements are proportionate to the age and needs of students and the College's safeguarding context.

The DSL, working with the senior leader responsible for filtering and monitoring and the IT Lead, oversees these arrangements to ensure that:

- safeguarding alerts are reviewed promptly;
- concerns are acted upon without delay;
- emerging patterns of online behaviour are identified;
- staff understand how to escalate concerns; and
- filtering and monitoring systems remain effective.

The effectiveness of filtering and monitoring arrangements will be reviewed at least annually, including checks of internet-connected devices and a review of emerging online risks. Outcomes will be reported through the College's safeguarding governance arrangements.

Information Security

The College recognises that information security and cyber security form part of its wider safeguarding responsibilities.

Appropriate measures are in place to protect College systems and personal data through secure access controls, account management, cyber security procedures and appropriate staff training. The College has regard to relevant Department for Education cyber security guidance.

Online Safety Education

Online safety is embedded throughout the curriculum, including PSHE, tutorials, assemblies, boarding programmes and enrichment activities.

Staff receive regular training on emerging online risks, filtering and monitoring arrangements, online safeguarding and the safe use of technology, including generative AI where appropriate.

Students are taught to:

- recognise and respond to online risks;
- use technology safely and responsibly;
- understand the risks associated with social media, online relationships and the sharing of nudes and semi-nudes;
- recognise misinformation, disinformation and manipulative online content; and

- know how and where to report concerns.

Parents and Carers

The College works with parents and carers to promote online safety by providing information about emerging risks and the College's approach to safeguarding, filtering and monitoring where appropriate.

Review

Technology and online risks evolve rapidly. The College reviews its online safety arrangements at least annually to ensure they remain effective and reflect emerging risks, student needs, safeguarding data and current statutory guidance. This will also be part of the annual safeguarding review.

The College's **IT Acceptable Use Policy, Online Safety Policy, Mobile Phone and Smart Technology Policy and Anti-Bullying Policy** provide further guidance on the safe and responsible use of technology.

Data Protection

The College is aware of its obligations under data protection legislation, including the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025.

The College recognises that effective information sharing is essential for identifying and responding to safeguarding concerns. Data protection legislation does not prevent the sharing of information where this is necessary and proportionate for safeguarding purposes. Staff must not allow concerns about data protection or confidentiality to delay the sharing of information where a child may be at risk of harm.

Safeguarding information will be shared only where there is a lawful basis for doing so and with those who need the information in order to safeguard and support the child. Staff should share information that is relevant, necessary and proportionate to the safeguarding purpose.

Where staff are uncertain about whether information should be shared, they should seek advice from the DSL or a Deputy DSL. However, where there is an immediate risk of harm, staff must not delay appropriate safeguarding action while seeking advice.

The College will ensure that safeguarding records are stored securely, access is appropriately restricted and information-sharing decisions are recorded where appropriate. The College has regard to relevant statutory and government guidance on information sharing and data protection in safeguarding practice.

10.0 Physical Intervention and Use of Reasonable Force

The College's approach to physical intervention, restrictive intervention and the use of reasonable force is set out in the **Restrictive Intervention and Use of Reasonable Force Policy**.

Any safeguarding concerns arising from the use of physical intervention or reasonable force must be reported and managed in accordance with this Safeguarding Policy.

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Anti-bullying

Our policy on the prevention and management of bullying (Anti Bullying Policy) is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

Health and safety

Our Health and Safety Policy, set out in a separate document, reflects the consideration we give to the protection of our students and staff both physically, within the college environment and when away from the school, for example when undertaking school trips and visits.

Safer recruitment

The colleges recruitment policy sets the vetting requirements for all staff who wish to work in our school whether paid or voluntary. Please see this policy

Whistleblowing

As stated in the Whistleblowing policy (available in the Staff Handbook) the College requires any member of staff to report to the Principal if they have any concern or worry in relation to practices taking place in College. Staff who report such issues are protected by the College from retribution or disciplinary action. The NSPCC whistleblowing helpline number is in the list below.

Governance of Safeguarding

The company's Compliance Director on behalf of governors conducts a formal annual audit on safeguarding files, manages the DSL annual appraisal along with the college Principal and monitors and samples the SCR, staff recruitment and all safeguarding systems on a regular basis throughout the year. The Compliance Director meets on a regular basis throughout the year with the safeguarding team to discuss issues and to provide the team with support. The college Principal and DSL meets with Governors at least once a term to report formally on safeguarding issues and to give Governors a safeguarding compliance update as well as providing an annual report on safeguarding. The Safeguarding Governor and Compliance Governor both maintain a level 3 qualification and other governors are trained to level 1.

11.0 Staff Training

- All staff annually will be asked to
 - Attend a safeguarding training session or attend an update session which will include Prevent, child-on-child abuse and on-line safety.
 - Asked to re-sign the staff Code of Conduct
 - Read and sign that they have read the updated version of KCSIE part one and Annex B.
 - Read and sign that they have read the updated college policy on safeguarding and all relevant policies (a list will be sent out annual by college for staff)
- New Staff on Induction will be asked to complete the following in addition to the above.
 - Basic safeguarding training and college policy with a member of the college safeguarding team

- Introduction to the safeguarding policy including procedures for dealing with child-on-child abuse
 - Introduction to part 1 KCSIE and Annex B.
 - On-line safety for teaching staff including how we teach the students to keep safe online
 - Role of DSL and DDSL and how to raise a concern
 - Student behavior policy
 - Safeguarding response to a child missing from education
 - Sign and discussion about the Staff Code of Conduct and Acceptable use of IT
- College Safeguarding Team (DSL & DDSL) will also be expected to update their inter-agency working training every two years and ensure they receive regular updates on changes to procedures and policy both locally and nationally. As well as receiving updated Prevent training every three years.
 - In addition to formal annual safeguarding training, the College provides regular, short update sessions throughout the academic year to ensure staff remain alert to current safeguarding trends, emerging risks and local priorities. These briefings may include updates to statutory guidance, local safeguarding partnership procedures, online safety developments and contextual safeguarding concerns. The College considers the safeguarding issues most relevant to its setting and student community, and provides contextualised examples to support professional discussion, reflection and deliberation. This approach ensures safeguarding remains a dynamic, responsive and embedded aspect of College practice.

External Safeguarding and Welfare Contacts

- Local Authority Designated Officer (LADO) team
 - 01223 727 967 (Monday to Friday during office opening hours)
 - 01733 234 724 (Emergency Duty Team - out of hours queries)
- Cambridge & Peterborough Safeguarding Partnership Board
 - Reporting a concern 0345 045 5203
 - Outside office hours, at weekends and on public holidays contact the emergency duty team on 01733 234724.
 - Reporting a concern link: [Report - Cambridgeshire County Council](#)
- Early Help Hub (EHH) Tel: 01480 376666
- Prevent Engagement Team prevent@cambs.pnn.police.uk Tel: 01480 42 2596
- Education Safeguarding Team ECPSGeneral@cambridgeshire.gov.uk
- Independent Schools Inspectorate 0207 600 0100
- Cambridgeshire Constabulary Non-emergency police number 101
- DfE helpline 0207 3407264
- Counter-extremism@education.gsi.gov.uk
- NSPCC Whistleblowing helpline 0800 028 0285
- [Lucy Faithfull Foundation - Preventing child sexual abuse](#)
- [Home | CSA Centre](#) - centre of expertise on child sexual abuse
- Safeguarding Governor Paul Ludlow (0744 4264924)

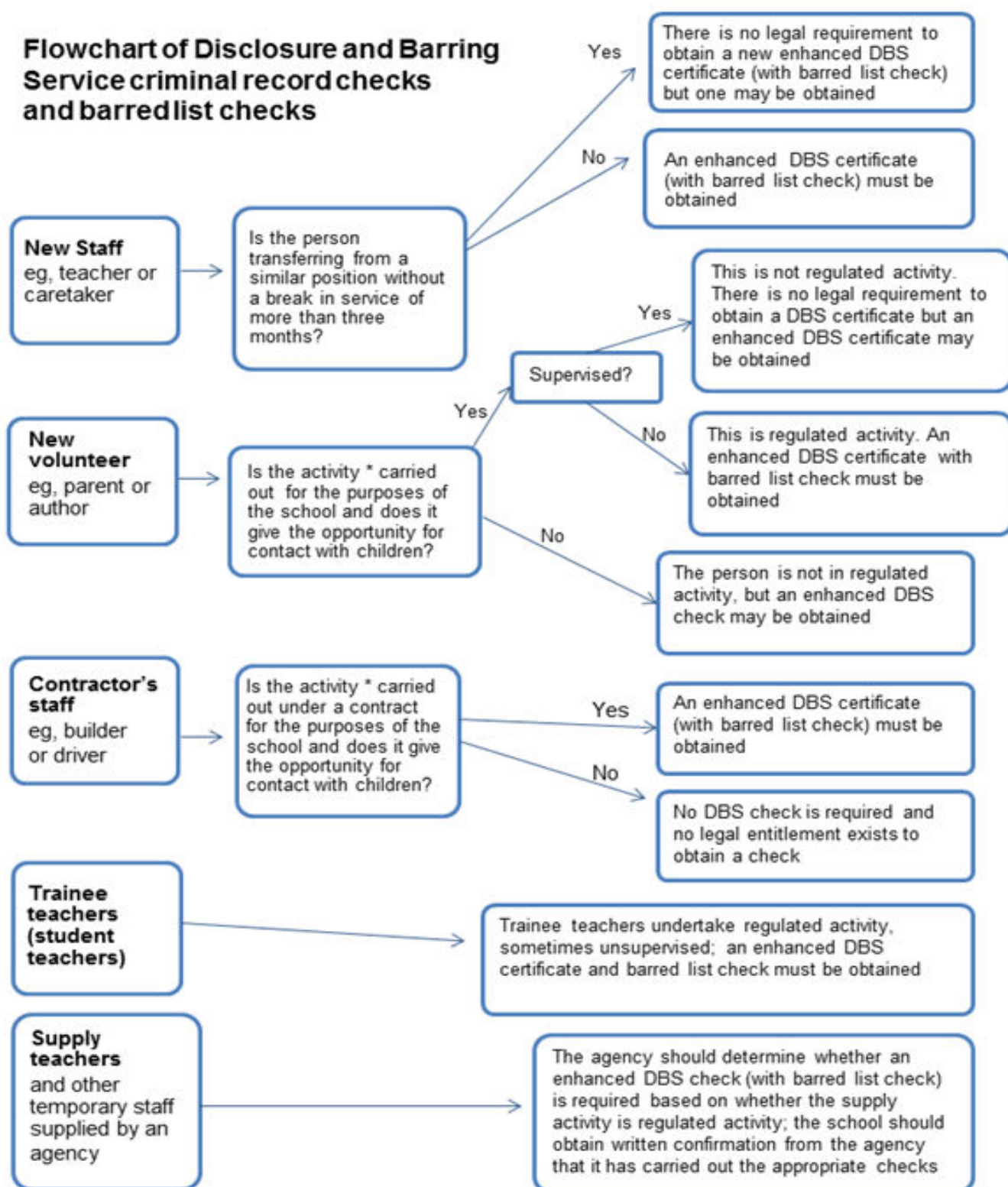


Signed by the Principal
Julian Davies 18/08/2026



Signed by the Named Governor for Safeguarding
Paul Ludlow

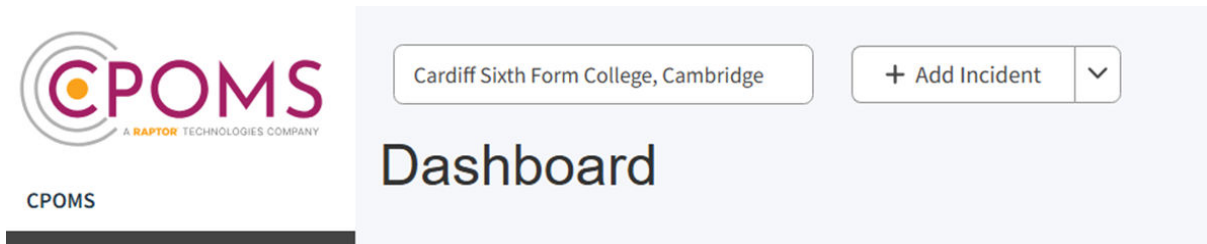
Appendix A - Flow chart of disclosure and barring service (DBS) checks



* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'

Appendix B - Reporting a concern

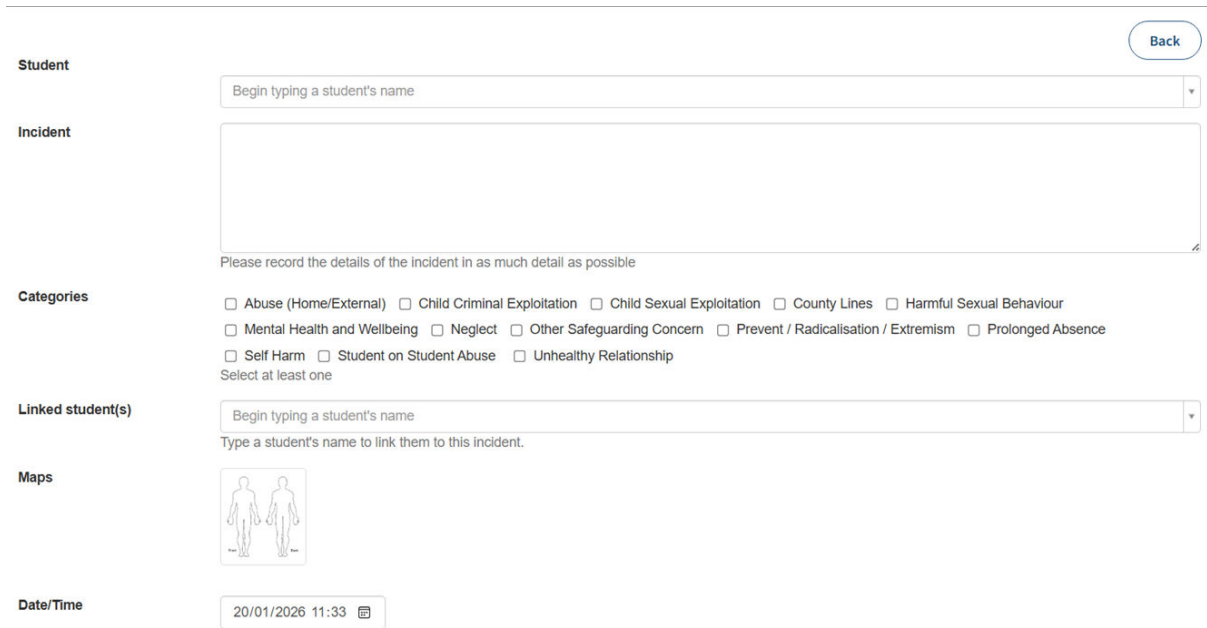
Use CPOMs



The screenshot shows the CPOMS dashboard. On the left is the CPOMS logo with the text 'A RAPTOR TECHNOLOGIES COMPANY' and 'CPOMS' below it. The main header area contains a text box with 'Cardiff Sixth Form College, Cambridge', a '+ Add Incident' button, and a dropdown arrow. Below this is a large 'Dashboard' title.

Click on +Add incident

Complete the form as appropriate



The screenshot shows the incident reporting form. It has a 'Back' button in the top right. The form fields are: 'Student' (a dropdown menu with the placeholder 'Begin typing a student's name'), 'Incident' (a large text area with the instruction 'Please record the details of the incident in as much detail as possible'), 'Categories' (a list of checkboxes: Abuse (Home/External), Child Criminal Exploitation, Child Sexual Exploitation, County Lines, Harmful Sexual Behaviour, Mental Health and Wellbeing, Neglect, Other Safeguarding Concern, Prevent / Radicalisation / Extremism, Prolonged Absence, Self Harm, Student on Student Abuse, and Unhealthy Relationship, with a note 'Select at least one'), 'Linked student(s)' (a dropdown menu with the placeholder 'Begin typing a student's name' and the instruction 'Type a student's name to link them to this incident.'), 'Maps' (a button with an icon of two people), and 'Date/Time' (a text box showing '20/01/2026 11:33' and a calendar icon).

Status	Active Do not select anything here
Assign to	Begin typing a staff member's name Do not assign to anyone
Files	Click to browse or drag a file to upload Add any relevant files (email/statement etc)
Alert Staff Members	Begin typing a staff member's name Do not alert anyone
Agency Involved	Do not type anything in here
Add to planner	☐ Do not click anything here
Submit Incident	

Click on 'submit incident'

Appendix C - Useful Support Telephone Numbers and Websites for Staff

General Advice and Support

NSPCC <https://www.nspcc.org.uk/preventing-abuse/child-protection-system/>

0808 800 5000 or text: 88858

email help@nspcc.org.uk

TES – Safeguarding

www.tes.com/teaching-resources/blog/safeguarding-collection

CTAC for advice on Child Trafficking Advice Centre

0808 800 5000

Mind ed

www.minded.org.uk

For professionals and volunteers

- <https://www.minded.org.uk/Catalogue/TileView>

For families - For families: <https://mindedforfamilies.org.uk/>

Samaritans

02920 344022

National Children's Bureau

<https://www.ncb.org.uk/>

Youth Access: helps you find free and confidential counselling, advice or information services in your local area

<http://www.youthaccess.org.uk/services/find-your-local-service>

Youth Wellbeing Directory resource finder

<https://www.youthwellbeing.co.uk/>

Young Minds can offer advice if students are feeling low or worried

www.youngminds.org.uk

TheSite.org is the online guide to life for 16-25 year olds in the UK. They provide non-judgemental support and information on everything from sex and exam stress to debt and drugs.

www.thesite.org

Teenage Health Freak provides web-based, accurate and reliable health information to teenagers in a contemporary, cringe free, entertaining and informative way.

www.teenagehealthfreak.org