



ST. ANDREW'S COLLEGE  
Cambridge

**SAFEGUARDING POLICY**

ST ANDREW'S COLLEGE POLICY DOCUMENT	
TO BE REVIEWED: August 2026	RESPONSIBILITY: Head
AUTHORISED BY: Annette Poulain DATE: 26/08/25	SIGNATURE: 

**Table of Contents**

<b>COLLEGE SAFEGUARDING TEAM</b>	<b>3</b>
<b>INTRODUCTION</b>	<b>3</b>
<b>PREVENTION</b>	<b>4</b>
<b>PROCEDURES</b>	<b>6</b>
<b>DEALING WITH A DISCLOSURE</b>	<b>8</b>
<b>MULTI-AGENCYWORKING</b>	<b>10</b>
<b>RECORD KEEPING</b>	<b>11</b>
<b>CONFIDENTIALITY AND INFORMATION SHARING</b>	<b>11</b>
<b>COMMUNICATION WITH PARENTS / CARERS</b>	<b>12</b>
<b>CHILD ON CHILD ABUSE</b>	<b>14</b>
<b>DEALING WITH SEXUAL VIOLENCE AND SEXUAL HARMFUL BEHAVIOUR BETWEEN CHILDREN</b>	<b>16</b>
<b>SUPPORTING CHILDREN</b>	<b>16</b>
<b>ONLINE SAFETY</b>	<b>25</b>
<b>PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN</b>	<b>29</b>
<b>GOVERNING BODY SAFEGUARDING RESPONSIBILITES</b>	<b>32</b>



ST. ANDREW'S COLLEGE  
Cambridge

**APPENDICES**

**APPENDIX A: TYPES OF ABUSE**

**APPENDIX B: EXTERNAL SAFEGUARDING AND WELFARE CONTACTS**

**APPENDIX C: SAFEGUARDING INTERNATIONAL STUDENTS**



# ST. ANDREW'S COLLEGE Cambridge

## COLLEGE SAFEGUARDING TEAM

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# ST. ANDREW'S COLLEGE

## Cambridge

### INTRODUCTION

St Andrew's College fully recognises the responsibility it has under section 175 of the Education Act 2002 (as amended), the Education (Independent College Standards) Regulations 2014, to have arrangements in place to safeguard and promote the welfare of children.

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



## ST. ANDREW'S COLLEGE Cambridge

This responsibility is more fully explained in the statutory guidance for colleges and colleges 'Keeping Children Safe in Education' (September 2025). All staff must be made aware of their duties and responsibilities under Part One of this document, which are set out below.

Staff should read the above document together with 'Annex B' of 'Keeping Children Safe in Education', 2025, if they are working directly with children. For those staff who do not work directly with children Annex A can be issued instead but this is a matter for the college to decide.

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

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

This policy sets out how the college's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are students at the college. Our policy applies to **all** staff, paid and unpaid, working in the college including governors. Boarding and support staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the college 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 college protective ethos;

**PROCEDURES** for identifying and referring cases, or suspected cases, of abuse or exploitation. The definitions of the categories of abuse are attached (see Appendix A);

**SUPPORTING CHILDREN** particularly 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.

This policy is available to parents on request and is on the college website.

### 1.0 **PREVENTION**

1.1 We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.

1.2 The college will therefore:



## ST. ANDREW'S COLLEGE Cambridge

- 1.2.1 Establish and maintain an environment where children feel safe, including in a digital context, and are encouraged to talk and are listened to.
- 1.2.2 Ensure children know that there are trusted adults in the college whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate.
- 1.2.3 Tailor our curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- 1.2.4 Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality.
- 1.2.5 Ensure that all college staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Equality, Inclusion and Diversity Policy'.
- 1.2.6 Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:
  - How to judge when a relationship is unsafe and where to seek help when needed, including when pupils are concerned about violence, harm, or when they are unsure who to trust.
  - The characteristics of positive relationships of all kinds, online and offline, including romantic relationships. For example, pupils should understand the role of consent, trust, mutual respect, honesty, kindness, loyalty, shared interests and outlooks, generosity, boundaries, tolerance, privacy, and the management of conflict, reconciliation and ending relationships.
  - The role of consent, including in romantic and sexual relationships. Pupils should understand that just because someone says yes to doing something, that doesn't automatically make it ethically ok.
  - Pupils should have an opportunity to discuss how some sub-cultures might influence our understanding of sexual ethics, including the sexual norms endorsed by so-called "involuntary celibates" (incels) or online influencers.
  - Online risks, including the importance of being cautious about sharing personal information online and of using privacy and location settings appropriately to protect information online.
  - Not to provide material to others that they would not want to be distributed further and not to pass on personal material which is sent to them. Pupils should understand that any material provided online might be circulated, and that once this has happened there is no way of controlling where it ends up. Pupils should understand the serious risks of sending material to others, including the law concerning the sharing of images.
  - Pupils should understand the potentially serious consequences of acquiring or generating indecent or sexual images of someone under 18, including the potential for criminal charges and severe penalties including imprisonment.
  - What to do and how to report when they are concerned about material that has been circulated, including personal information, images or videos, and how to manage issues online.
  - That the internet contains inappropriate and upsetting content, some of which is illegal, including unacceptable content that encourages misogyny, violence or use of weapons. Pupils should be taught where to go for advice and support about something they have seen online.
  - That pornography, and other online content, often presents a distorted picture of people and their sexual behaviours and can negatively affect how people behave towards sexual partners.



## ST. ANDREW'S COLLEGE Cambridge

- The concepts and laws relating to domestic abuse, including controlling or coercive behaviour, emotional, sexual, economic or physical abuse, and violent or threatening behaviour.
- What constitutes sexual harassment or sexual violence, and that such behaviour is unacceptable, emphasising that it is never the fault of the person experiencing it.
- The concepts and laws relating to harms which are exploitative, including sexual exploitation, criminal exploitation and abuse, grooming, and financial exploitation.

(Relationships Education, Relationships and Sex Education (RSE) & Health Education, DfE, 2021)

(Relationships Education, Relationships and Sex Education (RSE) & Health Education, DfE, 2025 – to be fully implemented by 2026)

1.2.7 We use Safer Corridors Toolkit developed by the Cambridgeshire PSHE Service which supports colleges and



## ST. ANDREW'S COLLEGE Cambridge

colleges in preventing and reducing sexual violence and harassment and responding to incidents.

### 2.0 PROCEDURES

2.1 We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi-Agency Procedures'. A copy of these procedures can be found on their website: [Multi-Agency Policies and Procedures | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)

### 2.2. The Designated Safeguarding Lead is:

Helen Walker

### 2.2.1 The Deputy Designated Safeguarding Leads are:

Annette Poulain  
Gill Robinson  
Beth Valentine  
Sanchi Bhatia  
Josephine Crasto  
Theresa Al-Rabee

### 2.2.2 The nominated governor for Safeguarding is:

Paul Ludlow

In addition we have the following roles:

### 2.2.3 The Prevent Lead is:

Helen Walker

### 2.2.4 The Domestic Abuse Lead is:

Helen Walker

### 2.2.5 The online Safety Lead is:

Helen Walker

### 2.3 The Governing body will:

2.3.1 Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL).  
The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be





## ST. ANDREW'S COLLEGE Cambridge

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.

- 2.3.2 Ensure that the role of DSL and DDSL is explicit in the role holder's job description (as outlined in Keeping Children Safe in Education, 2025 Annex C).
- 2.3.3 Ensure that the DSL has the appropriate status and authority within the college 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, 2025, 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**.
- 2.3.4 Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via updates, meetings or additional training **at least annually**.



## ST. ANDREW'S COLLEGE Cambridge

- 2.3.5 Ensure that every member of staff, paid and unpaid, and the governing body knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the **point of induction**.

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 any way related to a safeguarding issue 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 without delay. The record must be clear, precise, factual account of the observations. The recording form must be used. One of our designated DSLs will decide whether the concerns should be referred to Cambridge Children Social Care.



## ST. ANDREW'S COLLEGE Cambridge

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 puts 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 reason 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://safeguardingcambpeterborough.org.uk/concerned/professionals-reporting-a-concern/>

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

Staff should differentiate between children who are in need of additional support from one or more agencies and children who have suffered or are at risk of suffering serious harm. Children who have suffered or are at risk of suffering serious harm must be reported to children's social care immediately. Children who are in need of additional support from one or more agencies need to use the CAF (Common Assessment Framework) and "Team Around Child" (TAC) approaches. Students who need additional support should be referred to the college Pastoral team, via the Head of Boarding and Pastoral Care or Principal.

### **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
- reassure the student that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment
- 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



## ST. ANDREW'S COLLEGE Cambridge

When a student has made a disclosure, or when a concern is raised, the member of staff should:

- make brief factual notes as soon as possible after the conversation or observation
- Write up a full report on CPOMS and attach the original notes in case they are needed by a court or other professional
- record the date, time, place, noticeable non-verbal behaviour and the student's own words
- indicate on the body map the position of any bruising or other injury; no intimate areas of the body will be examined
- record statements and observations, rather than interpretations or assumptions

- 2.3.6 Ensure that the DSL or DDSL are always available (during college hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL and DDSL are not available.

Helen Walker (DSL) is available during college hours, during term time and whenever the boarding houses are in operation.

Any circumstance when Helen Walker (DSL) may not be available a DDSL will be the first point of contact. This is communicated clearly to all staff via email at the earliest opportunity and in advance wherever possible. The relevant DDSL will be named for clarity to all staff.

The emergency phone is available to staff and students throughout the college year and held on a rota basis by the Safeguarding Team.

If in the unlikely event no member of the Safeguarding team are available, staff must not delay in taking action. Staff should speak to their line manager or a member of the SLT and / or advice should be taken from children's social care. Their contact details can be found in Appendix B. The DSL should be informed at the earliest possible opportunity.

- 2.3.7 Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and Police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2023.
- 2.3.8 Nominate a governor for safeguarding who has undertaken appropriate training. The Safeguarding Governor for St Andrew's College is Paul Ludlow.
- 2.3.9 Ensure every member of staff and every governor knows:
- the name of the Designated Safeguarding Lead/Deputies and their role
  - how to identify the signs of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the college, inside and outside of home, and online
  - that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful



## ST. ANDREW'S COLLEGE Cambridge

- how to pass on and record concerns about a student.
- that they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation; and for referring safeguarding concerns to the DSL/DDSL
- what is meant by, and the importance of, showing professional curiosity
- that they have a responsibility to provide a safe environment in which children can learn
- where to find the Multi–Agency Procedures on the Safeguarding Children Partnership Board website
- their role in the early help/targeted support process
- the process for making referrals to children's social care
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- the role of filtering and monitoring and the process for reporting issues.

- 2.3.10 Ensure all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction. The training should be **regularly updated**, as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- 2.3.11 Ensure that **all** staff, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies, including low level concerns and allegations against staff.
- 2.3.12 Ensure that parents are informed of the responsibility placed on the college and staff in relation to child protection by setting out these duties in the college. This can be found on our website.
- 2.3.13 Ensure that this policy is available publicly either via the college website or by request from the college office.
- 2.3.14 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 college and college leadership staff.
- 2.3.15 Where pupils are educated off site or in alternative provision, the school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment.

## 2.4 Multi-Agency Working

The college will:

- 2.4.1 Work to develop effective links with relevant services to promote the safety and welfare of all students/students.
- 2.4.2 Co-operate as required, in line with 'Working Together to Safeguard Children,' (2023), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.



ST. ANDREW'S COLLEGE  
Cambridge

2.4.3 Notify the relevant Social Care Team immediately if:



## ST. ANDREW'S COLLEGE Cambridge

- it should have to suspend or exclude a student who is subject to a Child Protection Plan (whether fixed term or permanently)
- there is an unexplained absence of a student who is subject to a Child Protection Plan
- there is any change in circumstances to a student who is subject to a Child Protection Plan.

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

### 2.5 Record Keeping

The college will:

2.5.1 Keep clear, detailed, accurate, written records of concerns about children, even where there is no need to refer the matter to Children's Social Care immediately.

2.5.2 Records should include:

- a clear and comprehensive summary of the concern
- the child's wishes and feelings
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome
- a record of any discussion/communication with parents, other agencies etc.

2.5.3 Electronic records are stored on an identified, purpose-built, secure platform (CPOMS). In addition, appropriate secure storage arrangements are in place for any historic hardcopy safeguarding files.

2.5.4 Ensure all relevant safeguarding records are sent to the receiving college or establishment when a student moves colleges, within five days, in accordance with 'Keeping Children Safe in Education, 2025, (page 174) and the Cambridgeshire Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records.

The DSL will consider whether it would be appropriate to share information with the new school /college in advance of a child leaving.

2.5.5 Make parents aware that such records exist except where to do so would place the child at risk of harm.

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

### 2.6 Confidentiality and information sharing

2.6.1 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.



## ST. ANDREW'S COLLEGE Cambridge

The college will:

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

The Designated Safeguarding Lead/Deputies will:

- 2.6.6 Disclose information about a student to other members of staff on a 'need to know' basis, considering what is necessary, proportionate and relevant. Parental consent may be required.
- 2.6.7 Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent where to do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.
- 2.6.8 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' 2023)
- 2.6.9 In cases where the 'serious harm test' is met, colleges must withhold providing the data in compliance with colleges' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt colleges should seek independent legal advice.
- 2.6.10 Seek advice about confidentiality from outside agencies if required. (See 'Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, May 2024).

### 2.7 **Communication with Parents/Carers**

The college will:

- 2.7.1 Ensure that parents/carers are informed of the responsibility placed on the college and staff in relation to child protection by setting out its duties in the college prospectus/website.
- 2.7.2 Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action.
- 2.7.3 Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, for example if the college believes that notifying parents could place the child or another person at





# ST. ANDREW'S COLLEGE

## Cambridge

immediate risk of harm or prejudice the prevention or detection of crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if a Child in Need or Child Protection Enquiry is undertaken.



## ST. ANDREW'S COLLEGE Cambridge

### 2.8 Child-on-Child Abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. By definition, it applies to abuse by one child of another child – regardless of the age, of stage of development, or any age differential between them.

We recognise that child-on-child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate personal relationships between children; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; harmful sexual behaviour; sexual violence and sexual harassment including upskirting, and online sexual harassment; child sexual exploitation; child criminal exploitation; hate incidents and hate crime; racism; 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; and initiation/ hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

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

The college will therefore:

- 2.8.2 Create a whole college protective ethos in which child-on-child abuse, including sexual violence and sexual harassment will not be tolerated.
- 2.8.3 Provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys, perpetrators.
- 2.8.4 Ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or 'banter'.
- 2.8.5 Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- 2.8.6 Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- 2.8.7 Ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding procedures.
- 2.8.8 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. College will ensure that these children have a trusted adult in college to talk to.



ST. ANDREW'S COLLEGE  
Cambridge

- 2.8.9 Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.
- 2.8.10 The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's [Child Sexual Behaviour Assessment Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board](#)



ST. ANDREW'S COLLEGE  
Cambridge

[safeguardingcambspeterborough.org.uk](https://safeguardingcambspeterborough.org.uk) if there is a concern that a young person may be displaying sexually harmful behaviours.



## ST. ANDREW'S COLLEGE Cambridge

### 2.9 Dealing with Sexual Violence and Sexual Harassment between children

- 2.9.1 Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. 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.

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 college 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 college will:

- 2.9.1 Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- 2.9.2 Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 2.9.3 Make decisions on a case-by-case basis.
- 2.9.4 Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.9.5 Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 2.9.6 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 2.9.7 Liaise closely with external agencies, including police and social care, when required.
- 2.9.8 Refer to 'Keeping Children Safe in Education - Part Five', 2025, for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, March 2024)

### 3.0 SUPPORTING CHILDREN

#### Early help assessment

Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children or whole families, and is generally supported by CSC in consultation with the family.



## ST. ANDREW'S COLLEGE Cambridge

The College understands that providing early help is more effective in promoting the welfare of children than reacting later.

The college recognises that **any** child 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 and as such will support all children by:

- 3.1 Providing curricular opportunities to encourage self-esteem and self-motivation.
- 3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- 3.3 Applying the college's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the student's sense of self-worth. The college 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.
- 3.4 Liaising with the senior mental health lead where safeguarding concerns are linked to mental health in college for advice on case management.
- 3.5 Liaising with other agencies which support the student such as Social Care, Child and Adolescent Mental Health Services, Emotional Health and Wellbeing Service, Cambridgeshire Sexual Behaviour Service or Early Help (Targeted Support) Teams.
- 3.6 Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- 3.7 Recognising 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, (Risks outside the home).
- 3.8 Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see page 10 of Keeping Children Safe in Education, 2025 for the complete list. The list includes:

- **Children with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs**

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are more vulnerable to abuse and can face additional safeguarding challenges both inline and offline. College staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse, neglect and exploitation.

The college has students with emotional and behavioural difficulties and/or challenging behaviours. The college



ST. ANDREW'S COLLEGE  
Cambridge

will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self–



## ST. ANDREW'S COLLEGE Cambridge

esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how to recognise and manage risk including online.

The college has students who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Supervision by senior managers will be vigilant to create a protective ethos around the child.

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

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

### ○ **Young Carers**

The college recognises that children who are living in a home environment which requires them to act as a young carer for a family member with an illness or disability, mental health condition or an addiction can increase their vulnerability and that they may need additional support and protection.

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

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

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

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

College will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

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





## ST. ANDREW'S COLLEGE Cambridge

be at risk of criminal exploitation.

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

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

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

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

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

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

### ○ **Children Persistently Absent from Education**

College recognises that children who have unexplainable and/or persistent absences from education, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and



## ST. ANDREW'S COLLEGE Cambridge

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

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

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



## ST. ANDREW'S COLLEGE Cambridge

### ○ **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, the college 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 or criminal exploitation
- The child's substance misuse dependency is affecting their mental and physical health and social wellbeing
- Where the misuse is suspected of being linked to parent/carer substance misuse
- Where the child's substance misuse dependency is putting the child at such risk that intensive specialist resources are required
- Where the child is perceived to be at risk of harm through any substance associated criminality.

### ○ **Children Living with Substance Misusing Parents/Carers**

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic abuse.

When the college receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Parent/ carer/other family members drug and/or alcohol use is at a problematic level and are unable to provide care to child.
- Family home is used for drug taking / dealing / illegal activities.
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Child or household member found in possession of Class A or Class B drugs / drug paraphernalia found in home.
- Evidence of substance/drug misuse during pregnancy

### ○ **Children Living with Domestic Abuse**

The Domestic Abuse Act 2021 applies to those aged 16 or over and introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where



ST. ANDREW'S COLLEGE  
Cambridge

domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a



## ST. ANDREW'S COLLEGE Cambridge

serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

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

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

At St Andrew's College we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to students who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

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

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

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

Honour-Based Abuse can be defined as:

'An incident or pattern of violence, threats of violence, intimidation, coercion, control or abuse (including but not limited to psychological, physical, sexual, economic, spiritual, faith-related or emotional abuse) motivated by the perpetrator's perception that an individual has shamed, or may shame, the perpetrator, the family, or community or has otherwise broken, or may break, the perceived norms of the community's accepted behaviours, including by speaking out about the abuse and where the perception of shame may also prevent a



## ST. ANDREW'S COLLEGE Cambridge

victim from accessing support or help.'

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

The Marriage and Civil Partnership (Minimum Age) Act 2022 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

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

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 under 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 via the DSL. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate.

### ○ **Children previously in care or who have returned home to their family from care**

The college recognises that a previously looked after child potentially remains vulnerable. College will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board Multi-Agency Procedures.

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

College recognises that experiencing abuse, neglect or exploitation may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. College may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse, neglect or exploitation may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside



## ST. ANDREW'S COLLEGE Cambridge

the college 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. Risks outside the home take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

The college 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.

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

Children are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a colleges safeguarding approach.

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

**The following member of staff is the Prevent Lead and has undertaken Prevent Lead training**

**Helen Walker**

Staff are required to be alert to changes in children's behavior which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The college's Designated Safeguarding Lead (and Deputies) should be aware of local procedures for making a Prevent referral using the Prevent National Referral Form found on the Cambridgeshire and Peterborough Safeguarding Board website.

[National Prevent referral form \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)

See also Prevent Duty Guidance: for England and Wales, HM Government, (March 2024).

### ○ **Privately Fostered Children**

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative, in their own home for 28 days or more.

The college will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer in the usual way via the Customer Service Centre.

email: ReferralCentre.Children@cambridgeshire.gov.uk

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



# ST. ANDREW'S COLLEGE

## Cambridge

The college is 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.





## ST. ANDREW'S COLLEGE Cambridge

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

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

- 3.9.1 The College's safeguarding training includes guidance about early help processes and prepares all staff to identify students who may benefit from early help.
- 3.9.2 A member of staff who considers a student may benefit from early help should keep a written record of their concerns and in the first instance discuss with the DSL. The DSL will then consider the appropriate action to take in accordance with the Local Safeguarding Children Partnership menu of Early help services and their referral threshold document and liaise with parents and other agencies and settings up an inter-agency assessment as appropriate.
- 3.9.3 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role.
- 3.9.4 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the student's situation appears to be getting worse or does not appear to be improving.

### 4.0 Online Safety

- 4.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
  - 4.1.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole college approach to online safety empowers colleges to protect and educate students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
  - 4.1.2 The breadth of issues classified within online safety is considerable, but can be categorized into four areas of risk:
    - Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization and extremism.
    - Contact: being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.



## ST. ANDREW'S COLLEGE Cambridge

- Conduct: personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

4.2.0 St Andrew's College utilizes [Zenarmor](#), an enterprise grade content filtering system that aims to keep our students safe from harmful or inappropriate content while being able to provide students with the best possible internet experience. Zenarmor uses an AI-powered web categorisation database providing real time classification of hundreds of millions of websites blocking or filtering access to unsafe content immediately.

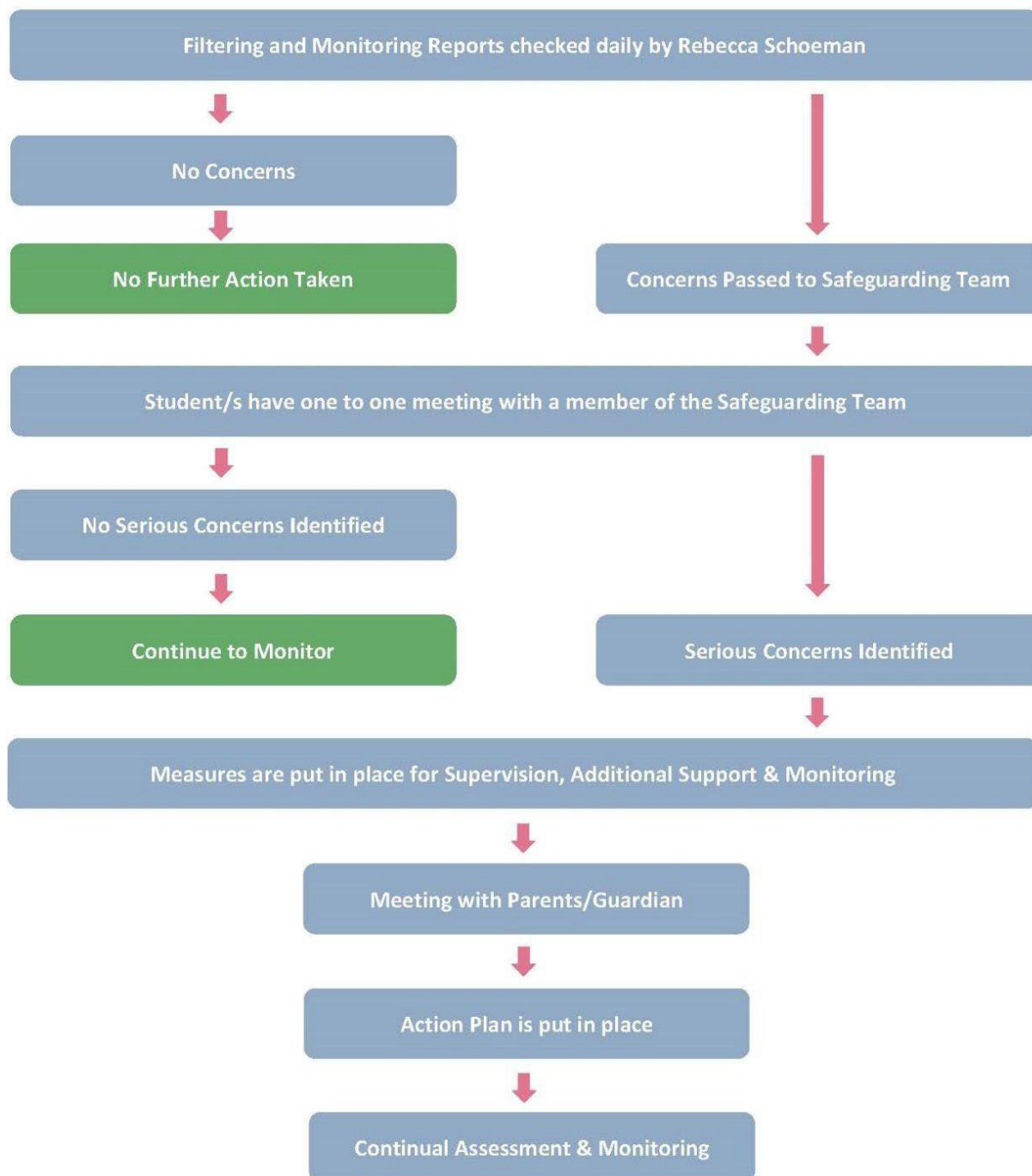
Zenarmor produces reports that provide an overview of all websites (those accessed and those blocked) visited by all college students, staff and visitors. These reports will be checked daily by the Operations Manager, Rebecca Schoeman. This is to ensure that no concerns are missed and to ensure there is visibility on all accounts. In the absence of the Operations Manager, a member of the Safeguarding Team will review records and action as appropriate. These reports will be auto-deployed from Zenarmor to the relevant staff email accounts. All red flag concerns come directly to the Safeguarding Team so that they can be responded to immediately.

Testing of the filtering system takes places weekly and is completed by the Operations Manager.

4.2.1 The process for handling concerns is illustrated in the chart below.



# ST. ANDREW'S COLLEGE Cambridge





## ST. ANDREW'S COLLEGE Cambridge

- 4.3 Any flags raised by the filtering system are reported directly to the Safeguarding Team to be reviewed and if appropriate to be investigated. An outside the home safeguarding approach is taken to all concerns flagged and all concerns will be reviewed and may be added to college PSHE lessons if applicable.
- 4.3.1 Where concerns are raised regarding a member of staff, these will be forwarded to the Head to review. Where the concerns are raised relating to the Head, it will be reviewed by the Safeguarding Governor.
- 4.3.2 The DfE has released guidance, teaching online safety in schools 2023, outlining how schools can ensure that students stay safe and behave online as part of the requirements of the curriculum. DfE resources can be found at [www.saferinternet.org.uk](http://www.saferinternet.org.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk).
- 4.3.3 The College's Student Online Safety and Acceptable Use Agreement outlines how the College ensures that students can use ICT, including the internet and related communication technologies, appropriately and safely. The College's policy on the prevention and management of bullying covers the issue of cyber bullying. The College's online safety policy gives information on filtering and information system security, as well as safe use of the internet and electronic devices.

#### 4.4 Education

The Safe use of technology is integral to the College's curriculum. Governors ensure students are educated in an age appropriate manner about the importance of safe and responsible use of technology, including the internet, social media and mobile electronic devices. The education will be tailored to the specific needs and vulnerabilities of individual children, including those with special needs or disabilities and those who are victims of abuse. It is understood that children with specific needs can face additional safeguarding challenges both in person and online.

The College believes that the internet and the constantly evolving technologies and devices to which children have access can be tools that enrich their lives. The College teaches them to view technology and new media positively whilst simultaneously protecting themselves.

The safe use of technology is a focus in all areas of the curriculum and staff training, and key safety messages are reinforced as part of assemblies and tutorial / pastoral activities, teach students:

- About the risks associated with using technology and how to protect themselves and their peers from potential risks;
- About the importance of identifying, addressing and reporting inappropriate behaviour, whether on or offline, and the risks of downplaying such behaviour as for example, 'banter' or 'boys just being boys';
- To be critically aware of content they access online and guided to validate accuracy of information;
- How to recognize suspicious, bullying or extremist behaviour;
- The definition of cyberbullying, its effects on the victim and how to treat each other's online identities with respect;
- The consequences of negative online behaviour;



## ST. ANDREW'S COLLEGE Cambridge

- How to report cyberbullying and / or incidents that make students feel uncomfortable or under threat and how the College will support those who behave badly;
- How to respond to harmful online challenges and hoaxes.

Those parts of the curriculum which deal with safe use of technology are reviewed regularly, at least annually, to ensure their relevance.

### 5.0 PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

- 5.1 The college will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education', 2025. This section should be read in conjunction with the college's Safer Recruitment Policy.
- 5.2 The governing body will ensure that at least one of the people on the recruitment panel has completed safer recruitment training.

**The following members of staff have undertaken Safer Recruitment training;**

**Annette Poulain  
Mark Taylor  
Christine Brierley  
Helen Walker  
Emma Warner  
Gill Robinson  
Denis Lucleavschii**

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

Allegations that may meet the harms threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

- Behaved in a way that has harmed a child, or may have harmed a child; and / or
- Possibly committed a criminal offence against or related to a child; and / or
- Behaved towards a child or children in a way that indicates they would pose a risk of harm to children; and / or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the College which creates transferable risk.

- 5.3.1 Any allegation of abuse made against staff, (including supply staff, other staff, volunteers and contractors) that meets the harms threshold as set out in Keeping Children Safe in Education, 2025, Part Four, Section One, will be reported straight away to the Head, Annette Poulain.

- 5.3.2 In cases where the Head is the subject of an allegation, it will be reported to the Safeguarding Governor.



## ST. ANDREW'S COLLEGE Cambridge

The college will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2025.

- 5.3.3 The college will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a teacher, member of supply staff or other staff, volunteer or contractor and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', 2025, Part Four and the college HR policies.
- 5.3.4 The Principal 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.
- 5.3.5 Before contacting the LADO, colleges and 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 possible police investigation.
- 5.3.6 Where the college identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and as appropriate the police immediately.
- 5.3.7 College will consider:
- **Looking after the welfare of the child** - the Designated Safeguarding Lead (or Deputy) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
  - **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- 5.3.8 The college 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.
- 5.3.9 Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
- 5.3.10 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.
- 5.4 **Concerns that do not meet the harms threshold (Part Four, Section Two)**
- 5.4.1 Low level concerns that do not meet the harms threshold should be reported to the Designated Safeguarding Lead 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.



## ST. ANDREW'S COLLEGE Cambridge

5.4.2 In cases where the Head is the subject of a low-level concern, it will be reported to the Safeguarding Governor. The college will follow the procedures set out in Part Four, Section Two of 'Keeping Children Safe in Education', 2025.

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

5.4.4 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.

5.4.5 The Colleges will keep these records confidential, holding them securely and will comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The record of the concern will be retained so that potential patterns of concerning or problematic or inappropriate behaviour can be identified and addressed. Records of low-level concerns that have been addressed with an individual will usually be kept on an individual's personal file. In addition all low-level concerns, including those that have not been addressed formally under the college's procedures, will also be stored securely in a central file (Low-level Concerns Log)

The storage and security of the Low-level Concerns Log will be accessible by the Principal, the Safeguarding Governor, the DSL and HR only. The Low-Level Concerns Log will be reviewed weekly by the DSL.

Details of Low-level Concerns and allegations found to be malicious or false will be removed from the personnel records and the Low-level Concerns Log.

In line with the College's Information and Records Retention Policy, information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Low Level Concerns Log will be retained by the College indefinitely. The College may in future be required to produce information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

5.4.6 The college will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the college or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable the 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 college are clear about



## ST. ANDREW'S COLLEGE Cambridge

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

- 5.4.7 The College should ensure that **all** staff, including supply staff, volunteers and contractors, are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of the Induction process, all staff, including supply staff, volunteers and contractors, will receive guidance about how to create appropriate professional boundaries (both online and offline) with all children, especially those with a disability or who are vulnerable. Staff are encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 5.4.8 All staff have signed to confirm that they have read the 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022).
- 5.4.9 The college 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 Position of Trust).

## 6.0 OTHER RELATED POLICIES AND PROCEDURES

### 6.1 Use of Mobile Phones and other Smart Devices Policy

- 6.1.2 Our policy on use of mobile phones and other smart devices, cameras and sharing of images is set out in a separate document 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/carers.

## 7.0 GOVERNING BODY SAFEGUARDING RESPONSIBILITIES

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

It will:





## ST. ANDREW'S COLLEGE Cambridge

- Nominate a governor for safeguarding who will take leadership responsibility for the college's safeguarding arrangements and practice and champion safeguarding issues.
- Ensure that all governors and trustees receive appropriate governor safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in colleges and colleges are effective and support the delivery of a robust whole college approach to safeguarding. This training will be regularly updated.
- Ensure governors and trustees are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.
- Ensure an annual safeguarding report (Annual Safeguarding Monitoring Report for Governors) is made to the full governing body and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.
- Ensure that this Safeguarding and Child Protection policy is published on the college website.
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems and ensure the effectiveness is regularly reviewed.
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

### 7.3 Use of college premises for non-college activities

- 7.3.1 If the governing body provides extended college facilities or before or after college activities directly under the supervision or management of college staff, the college's arrangements for safeguarding as written in this policy shall apply.
- 7.3.2 Where services or activities are provided separately by another organisation or individual, either on or off college site, the governing body will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the college on these matters where appropriate.
- 7.3.3 The governing body will use the guidance on 'Keeping children safe in out-of-college settings' (May 2025) which details the safeguarding arrangements that colleges should expect these providers to have in place.
- 7.3.4 The governing body or proprietor will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.



ST. ANDREW'S COLLEGE  
Cambridge

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**Annette Poulain**

Head of St Andrew's College Cambridge

Date

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**Paul Ludlow**

Safeguarding Governor for Dukes Education

Date



## ST. ANDREW'S COLLEGE Cambridge

### Appendix A

#### Categories of abuse, neglect and exploitation

**Abuse** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

**Neglect** - persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may occur during pregnancy as a result of maternal substance misuse. It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers failing to:

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

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

It may involve conveying to a child that they are:

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



## ST. ANDREW'S COLLEGE Cambridge

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

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



## ST. ANDREW'S COLLEGE Cambridge

**Risks Outside the Home** - is an approach that considers children and young people's experiences of significant harm beyond their families. The approach considers children and young people's experiences being not only influenced by their family, but also by their peer network, wider community and society in general. These threats can take a variety of different forms, including: Exploitation by criminal gangs and organised crime groups; Children who go missing and trafficking; Online abuse; Sexual exploitation; Influences of extremism leading to radicalisation



ST. ANDREW'S COLLEGE  
Cambridge



## ST. ANDREW'S COLLEGE Cambridge

### Appendix B

### Useful Contacts - Cambridgeshire

Education Safeguarding Team	<a href="mailto:ecps.general@cambridgeshire.gov.uk">ecps.general@cambridgeshire.gov.uk</a>
Education Safeguarding Manager – Sara Rogers	<a href="mailto:sara.rogers@cambridgeshire.gov.uk">sara.rogers@cambridgeshire.gov.uk</a>
Early Help Hub (EHH) - Targeted Support Service	Tel: 01480 376666
Customer Service Centre – social care referrals	Tel: 0345 045 5203
Emergency Duty Team (out of hours)	Tel: 01733 234724
Police Child Abuse Investigation Unit	Tel: 101
Local Authority Designated Officer (LADO)	<a href="mailto:lado@cambridgeshire.gov.uk">lado@cambridgeshire.gov.uk</a>
	Tel: 01223 727967
Senior Leadership Adviser – Phil Nash	Tel: 07920 270820
Prevent Officers	<a href="mailto:prevent@cambs.police.uk">prevent@cambs.police.uk</a>
	Tel: 01480 422277

### Relevant Documents

- “Keeping Children Safe in Education: Statutory guidance for schools and colleges” (September 2025)
- “Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings” (May 2025)
- “Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)
- “Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (May 2024)
- “Meeting digital and technology standards in schools and colleges, Filtering and monitoring standards for schools and colleges” (March 2025)
- “The Prevent duty: an introduction for those with safeguarding responsibilities - GOV.UK (www.gov.uk) (Jun 2023)
- “Prevent Duty Guidance: for England and Wales” (March 2024)
- “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (UKCIS, March 2024)



# ST. ANDREW'S COLLEGE

## Cambridge

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

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

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





## ST. ANDREW'S COLLEGE Cambridge

### Appendix C

## Safeguarding International Children

St Andrew's College recognizes that due to the international nature of our student body, many are vulnerable in terms of welfare and safeguarding due to;

- Being an international student living in a city.
- The level of English
- Living in a more independent setting
- Naivety and sheltered background
- Difference in cultures and attitudes to corporal punishment
- High levels of pressure to succeed and achieve top marks for families
- Mental Health and SEN concerns that may not be recognized by the country of origin, or stigmatised.

The college recognizes that abuse or witnessing violence may have an adverse impact on those children which may last into adulthood without appropriate intervention and support.

The college may be the only stable and secure element in the lives of the children at risk. When at the college their behaviour may be challenging or they may become withdrawn.

The college recognizes that some vulnerable children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

The Designated Safeguarding Lead will make timely referrals to Children's Services if Female Genital Mutilation is suspected and parents will not be informed before taking advice. This case will still be referred even if it is against the student's wishes. Some of our students may come from countries that practice FGM.

The Designated Safeguarding Lead will complete the SCPB Child Sexual Exploitation Risk Assessment Tool if there are concerns that a student is at risk of exploitative situations, contexts and relationships where young people receive something as a result of engaging in sexual activities and contact the referral centre if there is a concern that a child is at risk. Social services will support any child, irrespective of their nationality or citizenship.

The college recognizes that, statistically, children with emotional and behavioural difficulties and disabilities are most vulnerable to abuse. College staff who deal with children with complex and disabilities and / or emotional and behavioural problems should be particularly sensitive to indicators of abuse. International students may come from backgrounds where disclosing abuse is discouraged. The college seeks to educate students that the college is here to listen to them and to support them. All students will be educated in who they can go to in the college for help and support and that staff will be available to them 24 hours a day.