

Safeguarding and Child Protection

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<p>Related Documents:</p>	<p>Statutory Legislation / Acts:</p> <ul style="list-style-type: none"> • Domestic Abuse Act 2021 • Marriage and Civil Partnership (Minimum Age) Act 2022 • Equality Act 2010 • Children Act 1989 – Gov.UK • Human Rights Act 1998 – Gov.UK • Education Act 2002 – Gov.UK • Sexual Offences Act (Abuse of Trust) 2003 – Gov.UK • Female Genital Mutilation Act 2003 – Gov.UK • Children Act 2004 – Gov.UK • Education and Skills Act 2008 – Gov.UK • Counter-Terrorism and Security Act 2015 – Gov.UK • Children Missing Education 2016 – Gov.UK • General Data Protection Regulation (GDPR) 2018 – May 2018 <p>Statutory Safeguarding Guidance:</p> <ul style="list-style-type: none"> • Keeping Children Safe in Education (KCSiE) – Statutory guidance for schools and colleges, September 2025 • Working Together to Safeguard Children: A guide to multi-agency working – December 2023 • Teacher misconduct: the prohibition of teachers – October 2015 • Prevent Duty Guidance: for England and Wales – March 2024 • Revised Prevent Duty Advice for Schools – July 2015 <p>Non-Statutory Guidance / Advice</p> <ul style="list-style-type: none"> • ‘Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Colleges and Early Years settings’. • Guidance for Safer Working Practice for those working with children and young people in education settings – February 2022 • Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers – May 2024 • Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings – May 2025 • 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 – June 2023 • Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS) – March 2024 • What to do if you’re worried a child is being abused: Advice for practitioners – March 2015 • When to Call the Police: guidance for schools and colleges – National Police Chiefs’ Council • Use of reasonable force DfE Guidance, 2013for reference.
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Key Contacts

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Prevent Lead	Michelle Williams	michelle.williams@rbair.org.uk
Online Safety Lead	Vicky Ames	vicky.ames@rbair.org.uk
Domestic Abuse Lead	Sarah Clarke	Sarah.clarke@rbair.org.uk
The nominated RBET trustee for safeguarding and child protection	Carrie Herbert	carrie.herbert@rbet.ac
Local authority designated officer (LADO)	Cambridgeshire LADO	LADO@cambridgeshire.gov.uk 0345 045 5203 (Monday to Friday 9am – 5pm) 01733 234 724 (Emergency Duty team – out of hours queries)
	Essex LADO	lado@essex.gov.uk 03330 139 797 Out of hours: Essex Social Care: 0845 606 1212
Local Authority Multi-Agency Safeguarding Hub, (MASH).	Cambridgeshire MASH Team	03450 455203
	Essex MASH Team	0345 606 1212
Emergency Services:	999	
Cambridgeshire / Essex Police (non-emergency):	Police	101

For learners based outside Cambridgeshire/Essex:	Contact details for learners base in other counties, please see Appendix B	
National Helplines:	NSPCC: Childline: The Mix (under 25s):	0808 800 5000 0800 1111 0808 808 4994

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The Context for Policies at Red Balloon of the Air (RBAir)

Description of Learners

Learners who come to RBAir experience, or have experienced, significant difficulties in managing their mental health. This commonly results from diagnosed conditions such as Autism, ADHD, and other associated emotional and clinical issues. Access to education has generally been affected by a reduced capacity to self-regulate acute anxiety, manage environmental and social demands, and cope effectively with mainstream learning environments. Impact on academic progress and attendance has been considerable, and, in some cases, learners have not been in an education provision for up to two years.

At RBAir, we recognise that many Social, Emotional and Mental Health (SEMH) conditions and Special Educational Needs and Disabilities (SEND) are linked to experiences of trauma. Our approach is therefore underpinned by trauma-informed practice, ensuring our environment is safe, nurturing, and supports recovery and learning.

The Delivery of Education at RBAir

In order to meet the full range of needs of our learners, RBAir adopts a multi-modal delivery method, combining both online and in-person approaches. This supports the process of re-engagement with learning and enables the young person to work at their own pace to access the most appropriate pathway to recovery.

RBAir aims to provide the following:

- **A safe and predictable environment**
Whether online or in person, we establish routines and clear boundaries, reducing uncertainty and supporting learners to feel secure.
- **A 'relationships first' approach**
All staff prioritise building strong, trusting relationships, recognising that positive connections are key to healing from trauma and developing confidence in learning.
- **A trauma-informed approach**
All staff are trained to recognise that behaviour often communicates underlying emotional needs or trauma and therefore respond with empathy and curiosity, rather than with any punitive intent. De-escalation and restorative practice form the approaches to resolving any issues relating to behaviour, both online and in person.

- **Trained staff**
Our team receives ongoing professional development for SEND, trauma-informed practice and equality and diversity objectives.
- **Personalised support**
We develop individual support plans, which may include mentoring, counselling, and regular wellbeing check-ins, all tailored to each learner's needs.
- **Whole-provision culture**
Trauma-informed values underpin our policies and daily practice, ensuring all learners feel valued, understood and safe.
- **An engaging and enriched curriculum**
Whether online or in person, the learning experience for young people is designed to be responsive, flexible and engaging, enabling learners to begin to appreciate the benefits of re-engaging with education.
- **Family and multi-agency involvement**
We work closely with families and external professionals to ensure holistic, joined-up support for every learner.

INTRODUCTION

Red Balloon of the Air (part of Red Balloon Educational Trust) fully recognises the responsibility it has under section 175 of the Education Act 2002 (as amended), 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.

This responsibility is more fully explained in the statutory guidance for schools 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 provision to decide.

Through their day-to-day contact with learners and direct work with families all staff in RBAir 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 provision's proprietor and trustees discharge its statutory responsibilities relating to safeguarding and promoting the welfare of children who are learners at RBAir. Our policy applies to **all** staff, paid and unpaid, working in RBAir, including governors (please note that as an Alternative Provision, RBAir does not have a governing body; decision-making and legal responsibilities are retained by RBET trustees. RBAir aims to gain DfE registered school status in the near future – when this is in place, a full governing body will be created). Teaching assistants, mid-day supervisors, office staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact RBAir.

This policy reflects the Cambridgeshire Safeguarding Board, Child Protection Procedures and 'Keeping Children Safe in Education', September 2025.

There are four main elements to our policy:

- 1. PREVENTION** through the teaching and pastoral support offered to learners and the creation and maintenance of a whole-provision protective ethos;
- 2. 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);
- 3. SUPPORTING CHILDREN** particularly those who may have been abused or witnessed violence towards others;
- 4. 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 RBAir's website (www.rbair.org.uk/policies).

1. PREVENTION

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

RBAir will therefore

- 1.0.1 establish and maintain an environment where children feel safe, including in a digital context, and are encouraged to talk and are listened to;

- 1.0.2 ensure children know that there are trusted adults in RBAir whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate;
- 1.0.3 tailor its 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;
- 1.0.4 incorporate into the curriculum activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality;
- 1.0.5 ensure that all RBAir staff challenge instances of prejudice-related behaviour, including but not limited to: instances of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. Any prejudice-related incidents will be responded to in accordance with our Behaviour for Learning and PSHE Policies;
- 1.0.6 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 learners 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, learners 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. Learners should understand that just because someone says ‘yes’ to doing something, that doesn’t automatically make it ethically okay.
 - Opportunities 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.

- Learning 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. Learners 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. Learners should understand the serious risks of sending material to others, including the law concerning the sharing of images.
- Understanding 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 learners 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. Learners 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.
- 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, 2019)

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

2. PROCEDURES

- 2.1 RBAir will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding 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. RBAir's Designated Safeguarding Lead is:

Hannah Curry

- 2.2.1 RBAir's Deputy Designated Safeguarding Leads are:

Liz Smart, Sarah Clarke, Michelle Williams, Vicky Ames, Sam Coles.

- 2.2.2 RBAir's nominated trustee for safeguarding is:

Carrie Herbert

In addition, RBAir has the following roles:

- 2.2.3 The Prevent Lead is:

Michelle Williams

- 2.2.4 The Domestic Abuse Lead is:

Sarah Clarke

- 2.2.5 The Online Safety Lead is:

Vicky Ames

- 2.3 The *proprietor and trustees* 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 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 RBAir to carry out the duties of the post. The DSL will be given 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**;
- 2.3.5 ensure that every member of staff, paid and unpaid, and the RBET trustees, know who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the **point of induction**.

Staff members are required to log concerns immediately via CPOMS (the electronic safeguarding system) and report directly to the DSL/DDSL. Full procedures for reporting safeguarding concerns are detailed in **Appendix C**.

- 2.3.6 ensure that the DSL or DDSL are always available (during core daytime 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.

Out-of-hours support is available through the local authority Multi-Agency Safeguarding Hub, (MASH). The local MASH team acts as a single point of contact to assess and manage safeguarding concerns for vulnerable children and adults. They bring together professionals from different agencies, such as social care, police and healthcare, to share information, provide a comprehensive view of a child's needs, and determine the most appropriate support or intervention to protect them from harm.

Cambridgeshire MASH team – 0345 045 5203
Essex MASH team – 0345 606 1212

Out-of-office email replies from all RBAir staff contain signposting information to external agencies for support during the holidays;

- 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 trustee for safeguarding who has undertaken appropriate training;
- 2.3.9 Trustees should ensure every member of staff and every trustee know:
- the name of the Designated Safeguarding Lead/Deputies and their role;
 - how to identify the signs of abuse, neglect and exploitation, and understand that children can be at risk of harm inside and outside of RBAir, inside and outside of home, and online;
 - that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful;
 - how to pass on and record concerns about a learner;
 - 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 Trustees 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 Trustees ensure that **all** paid and unpaid 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 Trustees ensure that parents are informed of the responsibility placed on RBAir and staff in relation to child protection by setting out these duties within the provision. This can be found on our website www.rbair.org.uk;
- 2.3.13 ensure that this policy is available publicly either via RBAir's website www.rbair.org.uk or a printed copy is available on request;
- 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 RBAir leadership staff.

2.4 Multi-Agency Working

RBAir will:

- 2.4.1 work to develop effective links with relevant services to promote the safety and welfare of all learners;
- 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;
- 2.4.3 notify the relevant Social Care Team immediately if:
- RBAir should have to suspend or exclude a learner who is subject to a Child Protection Plan;
 - there is an unexplained absence of a learner who is subject to a Child Protection Plan;
 - there is any change in circumstances to a learner who is subject to a Child Protection Plan;
- 2.4.4 transfer information to a new school/setting immediately when a learner who is subject to a Child Protection Plan leaves. The Child Protection Chair and Social Care Team will also be informed.

2.5 Record Keeping

2.5.1 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.

2.5.2 Electronic records are stored on CPOMS which is the identified, purpose-built, secure platform used by RBAir. In addition, appropriate secure storage arrangements are in place for any historic hardcopy safeguarding files.

RBAir will:

2.5.3 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;

2.5.4 ensure all concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing;

2.5.5 keep concerns and referrals in a separate safeguarding file for each child (in electronic form through CPOMS). In addition, appropriate secure storage arrangements are in place for any historic hardcopy safeguarding files;

2.5.6 ensure all relevant safeguarding records are sent to the receiving educational establishment when a learner leaves RBAir, 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.

2.5.7 The DSL will consider whether it would be appropriate to share information with the new educational establishment in advance of a learner leaving;

2.5.8 make parents aware that such records exist except where to do so would place the child at risk of harm;

2.5.9 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.

RBair 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 learner or parent they will refer the request to the DSL or Headteacher;
- 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 learner 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 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).
- 2.6.10 In cases where the 'serious harm test' is met, schools must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.

2.7 Communication with Parents/Carers

RBAir will:

- 2.7.1 ensure that parents/carers are informed of the responsibility placed on the provision and staff in relation to child protection by setting out its duties on its website (www.rbair.org.uk);
- 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 provision believes that notifying parents could place the child or another person at 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.

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 the education provision, and online. By definition it applies to abuse by one child towards another child – regardless of the age, stage of development, or any age differential between them.

RBAir recognises 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; 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; 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.

RBAir will therefore:

- 2.8.2 create a provision-wide 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;

- 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 ensure that staff are aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk. RBAir will ensure that these children have a trusted adult within the provision to talk to;
- 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](https://safeguardingcambspeterborough.org.uk) (safeguardingcambspeterborough.org.uk) if there is a concern that a young person may be displaying sexually harmful behaviours.

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 educational setting.

RBAir will:

- 2.8.11 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);
- 2.8.12 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;
- 2.8.13 provide training for staff on how to manage a report of sexual violence or sexual harassment;
- 2.8.14 make decisions on a case-by-case basis;
- 2.8.15 reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making;
- 2.8.16 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;
- 2.8.17 give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations;
- 2.8.18 liaise closely with external agencies, including police and social care, when required.

3. SUPPORTING CHILDREN

RBAir 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 provision'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

learner's sense of self-worth. RBAir will ensure that the learner knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;

- 3.4 liaising with the Therapy Team Lead and Link Mentor Manager for advice on case management where safeguarding concerns are linked to mental health issues (and presentation when attending the provision both online and in person);
- 3.5 liaising with other agencies which support the learner 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). 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.

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

RBAir recognises 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 online and offline. 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.

RBAir has learners with emotional and behavioural difficulties and/or challenging behaviours. RBAir will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-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 content of lessons will be shared with parents/carers so that these skills can be supported at home.

RBAir has learners 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.

Where necessary, RBAir will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.

Under the Equality Act, 2010, 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.

3.8.1 Young Carers

RBAir 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.

RBAir will: seek to identify young carers; offer additional support within the organisation; 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.

3.8.2 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.

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

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

RBAir 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.

Our arrangements to reduce this risk

RBAir has the following arrangements in place to reduce the risk of criminal exploitation, including county lines and gang involvement:

- All learners undergo initial and ongoing risk assessments that consider criminal exploitation vulnerability.
- Staff receive annual training on recognising indicators including going missing, unexplained money/phones/gifts, relationships with older individuals, and involvement in crime.
- We work with local police to understand county lines and gang activity in Cambridge, Essex and areas where our online learners live.
- Learners receive education about exploitation, grooming, and consequences of crime through PSHE and Link Mentor sessions.
- We work in partnership with the police, Children's Services, Youth Offending Services and families.
- At-risk learners receive enhanced monitoring and support from Link Mentors.
- All concerns are reported to the DSL via CPOMS, who will make referrals as appropriate.
- We recognise that children involved in criminal exploitation are victims, even if they commit crimes.

3.8.3 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 Cambridgeshire and Peterborough Safeguarding Children Partnership Board's [Contextual Risk Screening Tool | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk) and refer to social care if there is a concern that a young person may be at risk of CSE.

RBAir 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 RBAir, we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to learners 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.

Our arrangements to reduce this risk

RBAir has the following arrangements in place to reduce the risk of child sexual exploitation:

- All learners undergo initial and ongoing risk assessments that consider CSE vulnerability.
- Staff receive annual training on recognising CSE indicators and the grooming process.
- The DSL receives enhanced CSE training and works with local CSE coordinators.

- Learners receive education about healthy relationships, consent, grooming, and exploitation through RSE curriculum and Link Mentor sessions.
- We work in partnership with Children's Services, the police, CSE coordinators and families.
- At-risk learners receive enhanced monitoring, regular check-ins and targeted interventions from Link Mentors.
- All CSE concerns are reported to the DSL via CPOMS, who will make referrals as appropriate.

3.8.4 Children Persistently Absent from Education

RBAir recognises that children who have unexplainable and/or persistent absences from education, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

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

RBAir endeavors to hold more than one emergency contact for each learner; this provides additional options for contacting 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, RBAir follows the procedure as set out in Cambridgeshire's Children Missing from Education guidance. RBAir 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.

3.8.5 Children Misusing Drugs or Alcohol

The discovery that a child is misusing legal or illegal substances, or reported evidence of their substance misuse, is not necessarily sufficient in itself to consider a Child in Need or Child Protection referral. However, RBAir will consider such action when there is evidence or reasonable cause to believe that:

- the child'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;
- the misuse is likely linked to parent/carer substance misuse;
- the child's substance misuse dependency is putting the child at such risk that intensive specialist resources are required;
- the child is perceived to be at risk of harm through any substance associated criminality.

3.8.6 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 RBAir receives information about drug and alcohol abuse by a child's parents/carers it will follow appropriate procedures.

This is particularly important if the following factors are present:

- Parents'/carers'/other family members' drug and/or alcohol use is at a problematic level and they are unable to provide care to the child.
- The family home is used for drug taking / drug dealing / illegal activities.
- There is chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance.
- The child or household member is found in possession of Class A or Class B drugs / or drug paraphernalia is found in home.
- There is evidence of substance/drug misuse during pregnancy.

3.8.7 Children Living with Domestic Abuse

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

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

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

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

RBAir 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. RBAir 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 RBAir, we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to learners 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 learners has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead.

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

3.8.8 Children at risk of ‘Honour- Based’ Abuse (HBA) including Female Genital Mutilation (FGM)

Honour-Based Abuse (HBA) can be defined as:

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

RBAir 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. They are no longer 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.

RBAir 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 learner’s wishes.

In accordance with the Female Genital Mutilation Act (2003) 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.

3.8.9 Children Previously in Care or who have Returned Home to their Family from Care

RBAir recognises that a previously looked after child potentially remains vulnerable. RBAir 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

3.8.10 Children Showing Signs of Abuse, Neglect and/or Exploitation

RBAir recognises that experiencing abuse, neglect or exploitation may have an adverse impact on children which may last into adulthood without appropriate intervention and support. RBAir 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 its effects through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

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

RBAir 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.

3.8.11 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 an education provision's safeguarding approach.

The Red Balloon Educational Trust, (RBET) trustees 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.

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The provision'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).

Our arrangements to reduce this risk

RBAir complies with the Prevent Duty under the Counter-Terrorism and Security Act 2015. We have the following arrangements in place:

- All learners undergo initial and ongoing risk assessments that consider radicalisation vulnerability.
- All staff complete Prevent awareness training at induction and as part of their annual safeguarding training every academic year.
- The DSL, DDSL and Prevent Lead receive enhanced training on extremist ideologies, Channel referrals and working with Channel panels.
- We have filtering and monitoring systems in place to limit exposure to extremist content online and identify at-risk learners.
- Learners learn about critical thinking, media literacy, fundamental British values and tolerance through PSHE and Link Mentor sessions.
- We work with local Prevent coordinators, police Prevent teams and Channel panels.
- All concerns are reported to the DSL via CPOMS, who will assess and make Channel referrals where appropriate.

3.8.12 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.

RBAir 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

3.8.13 Children who have Family Members in Prison

RBAir is committed to supporting children and young people who have a parent or a close relative in prison and will work with the family to find the best ways of supporting the child.

RBAir recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

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

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

4. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN

4.1 RBAir 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 RBAir's Safer Recruitment Policy.

4.2 The RBET trustees 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:

- *Hannah Curry – Headteacher*
- *Liz Smart – Assistant Headteacher*
- *Pookie Russell – Head of Administration*
- *Andrew Wilson – Head of Maths*
- *Sarah Clarke – Link Mentor Lead*
- *Samantha Coles – Administrator & Exams Officer*
- *Alison Bigglestone – SENDCo*
- *Rachel Curry – Therapist Lead*

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

4.3.1 Any allegation of abuse made against teachers, (including supply staff, other staff, volunteers and contractors) that meets the harms threshold as set out in Keeping Children Safe in Education, 2025, Part Four, Section One, will be reported immediately to the Headteacher.

- 4.3.2 In cases where the Headteacher is the subject of an allegation, it will be reported to the Chair of RBET Trustees. RBAir will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2025.
- 4.3.3 RBAir 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, its HR Policies, and seek advice from its contracted HR provider.
- 4.3.4 The Headteacher 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.
- 4.3.5 Before contacting the LADO, RBAir will 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.
- 4.3.6 Where the provision identifies 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.
- 4.3.7 RBAir will consider the following:
- **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.
- 4.3.8 RBAir 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 RBAir and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- 4.3.9 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.

4.4 Concerns that do not meet the harms threshold (Part Four, Section Two)

- 4.4.1 Low-level concerns that do not meet the harms threshold should be reported to the Headteacher. 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.
- 4.4.2 In cases where the Headteacher is the subject of a low-level concern, it will be reported to the Chair of RBET trustees. RBAir will follow the procedures set out in Part Four, Section Two of 'Keeping Children Safe in Education', 2025.
- 4.4.3 RBAir will deal with any such concern, no matter how small, where an adult working in or on behalf of the provision 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.
- 4.4.4 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, this should be respected as far as reasonably possible.
- 4.4.5 Records of low-level concerns will be stored securely within RBAir's safeguarding system, kept separate from personnel files, and retained for the duration of employment plus a minimum of six years thereafter. Access will be strictly limited on a need-to-know basis in line with UK GDPR and the Data Protection Act 2018. For further details, staff should refer to the RBAir Low-Level Concern Policy.
- 4.4.6 RBAir will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the provision (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable RBAir to: identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; ensure that adults working in or on behalf of RBAir are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the organisation.
- 4.4.7 All staff, including contractors and volunteers, receive RBET's Staff Code of Conduct Policy as part of their induction. This Code clearly sets out expectations for professional behaviour, safe working practices, and the maintenance of appropriate professional boundaries in all interactions with learners and their families, both in

person and online. Staff are guided on how to develop and maintain professional relationships, particularly with learners who may be vulnerable or have additional needs. The Code aligns with the *Guidance for Safer Working Practice for those working with Children and Young People in Educational Settings (2022)*, which sets out best practice for creating appropriate professional boundaries. Staff are also encouraged to self-refer if they find themselves in a situation that could be misinterpreted or may not meet expected professional standards. These expectations are reinforced through safeguarding training, ongoing guidance and regular updates.

- 4.4.8 Leaders actively monitor adherence to the Staff Code of Conduct through supervision, training and day-to-day management. All staff are required to acknowledge that they have read and understood the policy on an annual basis at the start of each academic year, ensuring they are aware of the standards expected of them and consistently apply these standards in their practice. This oversight helps maintain a safe environment for learners while protecting staff from potential misunderstandings or unfounded allegations.
- 4.4.9 RBAir will ensure that staff, contractors and volunteers are aware that sexual relationships with learners 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).

5. OTHER RELATED POLICIES AND PROCEDURES

5.1 Use of Mobile Phones and other Smart Devices Policy

- 5.1.1 RBAir's policy on the use of mobile phones and other smart devices, cameras and sharing of images is set out in a separate Trust-wide document: Staff ICT Acceptable Use Policy and is reviewed annually. It is recognised that personal mobile phones have the potential to be used inappropriately and therefore RBET has developed a policy to outline the required protocol for all staff, learners, volunteers and parents/carers. Learners' use of RBAir-provided devices and systems is governed by the Learner ICT Acceptable Use Agreement and Laptop Induction procedures, as outlined in the Admissions Policy.

5.2 RBET Online Safety Policy

5.2.1. Due to the multi-modal delivery of provision at RBAir, there are specific processes in place for learners accessing the provision that enhance the safeguarding practices around learners' online learning as part of their programme. Please see the section 'Educating learners about online safety' in the RBET Online Safety Policy which outlines the induction requirement of a bespoke online safety programme to be completed by all new students.

5.2.2. RBAir Filtering and monitoring arrangements:

- **Filtering systems** Smoothwall Filter is used to assess the permissibility of every webpage by using AI to evaluate the context and construction of the site and block any harmful content.
- **Monitoring systems** Smoothwall Monitor is a human moderated digital monitoring solution. If any unusual digital behaviours which signal a young person is at risk are detected, an alert is sent to the RBAir Safeguarding Team and logged automatically in our safeguarding software, CPOMS.
- **Weekly reviews** The Safeguarding Team (DSL & DDSLs) conduct weekly reviews of filtering and monitoring reports. All reviews and any actions taken are recorded on CPOMS. Concerns are then responded to following the same procedures as any other safeguarding concern (see 'Procedures' section within this policy). High-risk concerns are escalated to the DSL immediately.
- **Record keeping** All filtering and monitoring records, reviews and actions are stored securely on CPOMS ensuring a clear audit trail of our safeguarding response.
- **Governance and oversight** The nominated RBET trustee for safeguarding receives reports on filtering and monitoring effectiveness. RBAir conducts an annual review of these systems.

5.3 Admissions Policy

5.3.1. RBAir's Admissions Policy clearly states that a six-week course on Online Safety is mandatory, and that failure to complete it will result in termination of the placement. This complies with RBET's Online Safety Policy (see section 'Educating learners about online safety').

5.3.2 All learners have an individualised laptop induction with an Admissions Officer as part of their onboarding, which includes them being taken through the filtering and monitoring processes that are in place. This includes the explanation that every key stroke

on an RBAir issued device is monitored for safeguarding purposes. See RBAir's Admissions Policy's section 'Laptop induction' for further information.

6. Trustee Body Safeguarding Responsibilities

- 6.1 The Red Balloon Educational Trust Trustees should ensure they facilitate a whole provision/organisation 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.
- 6.2 The trustees fully recognise its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in RBAir are effective and comply with the law and government guidance at all times.

RBET will:

- nominate a trustee for safeguarding who will take leadership responsibility for the provision's safeguarding arrangements and practice and champion safeguarding issues;
- ensure that all trustees receive appropriate governor/trustee 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 at RBAir are effective and support the delivery of a robust whole-provision approach to safeguarding. This training will be regularly updated;
- ensure 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/trustees) is made to the full trustee body. 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 RBAir's 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.

6.3 This policy was ratified on 8th September 2025 and will be reviewed on 8th September 2026

Signed by the Headteacher

H. Curry.

Appendix A

Categories of abuse, neglect and exploitation

Abuse is 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 is 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.

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 persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- worthless
- unloved

- inadequate
- valued only insofar as they meet another person's needs

It may include:

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

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

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

It may involve:

- seeing or hearing the ill-treatment of another;
- serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger;
- the exploitation or corruption of children

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

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

This may involve:

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

Sexual abuse 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.

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

Up-skirting is a form of sexual harassment and a criminal offence under the Voyeurism (Offences) Act 2019. Up-skirting typically involves taking a picture under a person's clothing without their permission, with the intention of viewing, or enabling others to view, their genitals or buttocks (whether exposed or covered with underwear) to obtain sexual gratification, or to cause the victim humiliation, distress or alarm.

It is a behaviour which typically occurs in crowded public places, for example on public transport or at music festivals, where the victim will often be unaware that the offence is taking place.

However, up-skirting can occur in any setting, including schools and online.

Signs that a child may be a victim of up-skirting:

- Expressing discomfort or distress about being in certain locations or around certain individuals
- Reluctance to participate in activities where they may be vulnerable (e.g., PE, assemblies, stairs)
- Reports from other pupils about suspicious behaviour
- Changes in behaviour, becoming withdrawn or anxious
- Refusing to wear certain clothing (e.g., skirts, dresses)
- Awareness that images have been taken without consent

Signs that a child may be perpetrating up-skirting:

- Inappropriate use of mobile phones or devices, particularly in areas where this behaviour could occur (e.g., on stairs, in corridors)
- Sharing or discussing inappropriate images
- Making jokes or comments that trivialise this form of sexual harassment
- Previous incidents of sexual harassment or inappropriate behaviour

How Red Balloon of the Air responds to up-skirting:

All incidents of up-skirting will be treated as serious safeguarding concerns and will be responded to in line with this policy and Keeping Children Safe in Education (KCSIE) 2025.

Staff who become aware of up-skirting (whether suspected or confirmed) must:

- Report the concern immediately to the DSL or DDSL via CPOMS
- Not attempt to view, share or delete any images
- Preserve any evidence (e.g., devices) and hand them to the DSL immediately
- Support the victim and reassure them that they will be taken seriously

The DSL will:

- Assess the incident and determine the appropriate response, which may include:
- Supporting the victim and ensuring their safety and wellbeing
- Investigating the incident in line with the school's behaviour policy
- Contacting parents/carers of all children involved
- Making a referral to police, as up-skirting is a criminal offence
- Making a referral to children's social care if there are wider safeguarding concerns
- Working with external agencies as appropriate
- Consider the needs of both the victim and the alleged perpetrator, recognising that the alleged perpetrator may also have unmet needs or be at risk of harm
- Ensure appropriate sanctions are applied in line with the school's behaviour policy
- Review risk assessments and safety plans as necessary

Red Balloon of the Air recognises that up-skirting is a form of sexual violence and will never be dismissed as "banter", "just having a laugh" or "part of growing up". We maintain a zero-tolerance approach to all forms of sexual harassment and sexual violence.

Staff will receive training on up-skirting as part of their safeguarding training, including how to recognise signs and how to respond appropriately.

Appendix B – Key Contacts - Other Counties

Authority Name	Role	Contact
Bedford Borough	MASH	Integrated Front Door (IFD) consultation: For advice and discussion on concerns about a child. Phone: 01234 718 211 Hours: Monday to Thursday, 9:00 am - 5:20 pm; Friday, 9:00 am - 4:20 pm (excluding bank holidays) Pan-Bedfordshire Emergency Duty Team (Out of Hours): For urgent situations outside of office hours. Phone: 0300 300 8123 Urgent/immediate danger: Call the Police on 999
	LADO	Phone: 01234 276693 Email: LADO@bedford.gov.uk
Central Bedfordshire	MASH	MASH Integrated Front Door - Phone (Office Hours): 0300 300 8585 Phone (Out of Hours): 0300 300 8123 Email: cs.accessandreferral@centralbedfordshire.gov.uk Urgent/immediate danger: Call the Police on 999
	LADO	Phone: 0300 300 8142 Email: LADO@centralbedfordshire.gov.uk
Hertfordshire	MASH	MASH and general child safeguarding: For immediate concerns, professionals should call 0300 123 4043 (available 24/7) Email: contact@hertfordshire.gov.uk for non-urgent enquiries Urgent/immediate danger: Call the Police on 999
	LADO	For children's safeguarding and LADO referrals: Phone: 0300 123 4043 (available 24/7, including out-of-hours) Online: Professionals can report concerns online via the Hertfordshire County Council website
Peterborough	MASH	Multi-Agency Support Hub (MASH) for professional advice Telephone: 01733 747474, option 4 (9am to 5pm, Monday to Friday) Note: Professionals should use the online referral portal for formal safeguarding referrals, but the MASH line is for advice on potential referrals. Emergency Duty Team (Out-of-hours)

		Telephone: 01733 234724 Note: This is for urgent concerns outside of office hours. Urgent/immediate danger: Call the Police on 999
	LADO	For allegations against staff and volunteers: 01733 864038 Email: LADO@peterborough.gov.uk Professional Consultation Line: 01733 864180 (for advice on possible referrals)
Suffolk	MASH	MASH Professional Consultation Line: 0345 6061499. This is for professionals who want to discuss a case and decide if a referral is necessary. MASH Webchat: Available for schools, providing a faster response for professional advice. Customer First: 0808 800 4005. Use this for urgent safeguarding concerns or if you cannot access the MASH consultation line or portal. In an emergency: Call 999 if there is immediate danger to the child.
	LADO	Phone: 0300 123 2044 Email: LADO@suffolk.gov.uk For immediate risk of harm: If you are concerned about a child and there is an immediate risk, call Customer First on 0808 800 4005 or dial 999 in an emergency.

Appendix C – Procedures for Reporting Safeguarding Concerns

This appendix provides procedures for reporting safeguarding concerns at Red Balloon of the Air. Safeguarding is everyone's responsibility. If you have a concern about a child, you must act immediately.

1. For All Staff Members

Reporting a concern:

1. Report immediately via CPOMS (RBAir's electronic safeguarding system)
 - Include:
 - The child's name
 - Date and time
 - What you observed or were told (use the child's exact words in quotation marks)
 - Factual information only – no opinions or assumptions
 - Appropriate category (e.g., physical abuse, neglect, online safety)
2. Submit to the DSL/Deputy DSL

If urgent or immediate risk of harm:

1. Report via CPOMS AND speak directly to the DSL/Deputy DSL immediately
2. If unavailable, speak to a member of the Senior Leadership Team
3. If no senior leader is available and the child is at immediate risk, contact:
 - Emergency services: 999
 - Cambridgeshire MASH: 0345 045 5203
 - Essex MASH: 0345 606 1212

For online incidents:

- Follow the same procedure
- Include session details (date, time, platform)
- Take screenshots if safe to do so
- Do not share images of concern – report to DSL immediately

2. For Volunteers, Contractors and Visitors

- Report your concern to any member of staff
- Ask to speak to the DSL or Deputy DSL
- Provide as much information as possible

- Do not delay reporting
- Staff will record your concern on CPOMS on your behalf

If immediate risk and no staff available:

- Emergency services: 999
- Cambridgeshire MASH: 0345 045 5203 / Essex MASH: 0345 606 1212

3. For Parents, Carers and Family Members

- Contact the DSL, Deputy DSL, Headteacher or Senior Leadership Team
- Provide details of your concerns
- The DSL will listen, record, explain next steps and keep you informed (where appropriate)

If immediate risk:

- Emergency services: 999
- MASH teams (see above) / NSPCC: 0808 800 5000

4. For Learners and Young People

Speak to a trusted adult:

- Your Link Mentor, any teacher, any staff member, or the DSL

Contact remotely:

- Email: admin@rbair.org.uk or essex@rbet.ac
- Call: 01223 354338 (Cambridge) or 01245 905014 (Essex)

External support:

- Childline: 0800 1111 or www.childline.org.uk
- NSPCC: 0808 800 5000
- The Mix (under 25s): 0808 808 4994 or www.themix.org.uk

You will be taken seriously, listened to, and supported. You will not get into trouble for reporting a concern.

5. For Commissioners and Referring Agencies

Contact the DSL immediately:

- Hannah Curry: hannah.curry@rbair.org.uk / 01223 354 338 / 07868 556175
- Provide child's details, nature of concern, relevant background and your contact details

6. What Happens After You Report a Concern?

The DSL/Deputy DSL will:

1. Acknowledge the concern
2. Assess the information (severity, immediate safety, risk to other children)
3. Determine appropriate response:
 - Monitoring and internal support
 - Early help assessment
 - Referral to children's social care (if child harmed/at risk/in danger)
 - Referral to other agencies (police, LADO, Channel programme)
 - Multi-agency working
4. Complete risk assessment (where appropriate)
5. Keep detailed records on CPOMS
6. Share information on a need-to-know basis
7. Keep reporter informed (where appropriate)
8. Support the child and work with families/agencies

All actions taken in line with:

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children 2023
- Cambridgeshire and Peterborough Safeguarding Partnership Board Multi-Agency Procedures
- RBAir's Safeguarding and Child Protection Policy

7. Out-of-Hours Support

During term-time core hours: DSL or Deputy DSL always available

Out-of-hours (evenings, weekends, holidays):

- Cambridgeshire MASH: 0345 045 5203
- Essex MASH: 0345 606 1212
- Emergency: 999

8. Important Principles

- Safeguarding is everyone's responsibility
- Act immediately – do not wait for proof
- The child's safety is paramount
- You will never be criticised for raising a genuine concern in good faith
- Do not investigate – report to the DSL

- If unsure, always report it