BEP Group: Policy Pack

staff, volunteers, learners & consultants

BEP GROUP

Safeguarding

Policies and Procedures

Last Review: August 2020
Next Review: August 2021

Monitoring and Review of policy

This Policy will be monitored regularly and reviewed in response to any changes in legislation or incidents occurring.

Version control

22/01/15	KS	Policy reviewed and edited to take account of vulnerable adults and working at other centres.
15/08/15	KS	CPO lead and deputy names updated.
11/01/16	KS	Policy reviewed and links to external information confirmed.
04/05/17	KS	Policy reviewed and additional information in Appendix 2 added
05/04/18	KS	Policy reviewed and minor alterations/corrections made.
05/09/18	KS	Policy reviewed and minor alterations/corrections made.
05/04/19	KS	Safeguarding Team and contact details updated (including Designated Safeguarding Lead – DSL)
09/11/19	KS	Links to current DfE Statutory Guidance clarified. New sections on 'Peer on peer' abuse and upskirting added to Appendix 2.
26/08/20	SF	Date at Bottom of page 4 amended to KCSIE Sept 20 addition of section on page 5 - intro KCSIE 20 and our commitment 1.2.5 addition of wording 'inter agency working' 1.2.8 Date change to Sept 20 1.3.2 amended wording - Havering MASH to Local Authority MASH 1.6.1 additional bullet regarding safer recruitment 1.7.4 additional bullet referring to RSE 1.7.5 new section added referring to alternative provision

"Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action."

(Keeping Children Safe in Education – DfE, September 2020)

Contents

DfE Statutory Guidance

This policy should also be read in conjunction with DfE statutory guidance, including:

- Keeping Children Safe In Education - Sept 20
- Working Together to Safeguard Children – July 2018

A full list of statutory guidance can be found at: https://www.gov.uk/government/collections/statutory-guidance-schools#safeguarding-children-and-young-people

1. Safeguarding Students and vulnerable adults

This Safeguarding Policy is for all school staff, parents, governors, volunteers and the wider school community. It forms part of the safeguarding arrangements for our school and should be read along with the school's Staff Code of Conduct, Behaviour Policy, Attendance Policy and Online Safety Policy. All staff are given a copy of Part One and Annex A of the statutory guidance

Our school is committed to safeguarding children and to create a culture of vigilance in school. This policy should also be read in conjunction with Keeping Children Safe in Education (DfE, 2020).

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education 2020 as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

For the purposes of this policy children includes everyone under the age of 18

1.1 Safeguarding Aims

1.1.1 To have in place procedures to ensure that we meet our responsibilities for safeguarding Students and vulnerable adults from abuse.

1.1.2 To have in place procedures to ensure that staff are protected against allegations of abuse.

1.1.3 To support the child's or vulnerable adult's development in ways that will foster security, confidence and independence.

1.2 Safeguarding Policy

1.2.1 The safety and protection of Students and vulnerable adults is of paramount importance to every person in the organisation. We have in place procedures as taken from the government guidance document 'Safeguarding Children and Safer Recruitment' to ensure their safety.

1.2.2 We are aware that certain personnel are in a unique position to notice injuries, marks or bruises when Students and vulnerable adults are undertaking certain activities, which might indicate that individual has been abused. We believe that we must investigate all injuries for the safety and protection of the Students and vulnerable adults in our care.

1.2.3 It is acknowledged that a child can be abused, harmed or neglected in a family, institution or community setting or online by someone known to them, or less commonly, by a stranger, this includes someone in a position of trust such as a teacher or other professional.

1.2.4 Safeguarding and the promotion of a child's welfare covers all aspects of the child's life and BEP Group is committed to ensuring that all its actions in respect for a child are compatible with this aim. BEP Group are aware that early identification of concerns and the use of Early Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse.

1.2.5 As part of our responsibilities for adopting child protection guidelines through procedures and a code of conduct for staff and volunteers BEP Group aim to:
- Provide a systematic means of monitoring children known or thought to be at risk of harm.
- Support pupils who have suffered abuse in accordance with their agreed Child Protection Plan.
- Emphasise the need for good levels of communication between all members of staff and inter-agency working.
- Carefully follow the procedures for recruitment and selection of staff and volunteers, ensuring that all adults within our BEP Group who have access to children have been checked as to their suitability.
- Set out a structured procedure within the BEP Group community in cases of suspected abuse.
- Share information about child protection and good practice with children, parents and carers, staff and volunteers.
- Develop and promote effective working relationships with other agencies, especially the Police and Social Care. Sharing information about concerns with agencies who need to know, and involving parents and children appropriately.
- Ensure all staff are aware of the BEP Group's code of conduct.
- Ensure all staff have signed the AUP - acceptable use policy
- Provide effective management for staff and volunteers through support, supervision and training.

1.2.6 We have in place procedures to ensure that we meet our responsibilities for safeguarding Students and vulnerable adults from abuse.

1.2.7 We have in place procedures to ensure that all staff are protected against allegations of abuse.

1.2.8 This policy and procedures should be read in conjunction with
• London Safeguarding Children Procedures 5th edition
• DfE Guidance: Working Together to Safeguard Children – July 18
• DfE Guidance: Keeping children safe in education – Sept 20
• BEP Group online safety policy
• BEP Group Code of Conduct
• Staff Acceptable Use Agreement

1.2.9 This policy and the following procedures apply to all paid staff, volunteers and governors working with or in BEP Group

1.3 Safeguarding Procedure

1.3.1 The following procedures outline the action to be taken if it is suspected that a child may be being abused, harmed or neglected. There are four categories of abuse:

• Physical Abuse
• Emotional Abuse
• Sexual Abuse
• Neglect

1.3.2 All concerns must be reported to the Child Protection Officer and discussed immediately. The Child Protection Officer will decide the appropriate action in consultation with the SMT.

1.3.3   In the event that there are concerns about a child the Designated Safeguarding Lead will access the London Authority MASH threshold document and the London Child Protection Procedures 5th edition to inform their decision making process with regard to the presenting safeguarding concerns.

1.3.4   Immediate Response to the Child/vulnerable adult:
- All personnel will undertake training on responding to a child.
- All information will be recorded using the Pan London Child Protection Guidelines Paperwork.

1.3.3   Recording information
- Notes must be taken which record:
  - The date
  - Time
  - Place
  - Nature of the concern
  - All facts
  - Observed injuries and bruises
- Note the actual words of the child and not your opinion
- Sign the notes and hand to the Child Protection Officer

1.3.4   After a child has disclosed abuse the Designated Lead should seek advice on whether or not it is safe for a child to return home to potentially abusive situation. The Designated Lead should take immediate action to contact MASH (including Children's Social Care and Police) to discuss putting safety measures into effect.

1.3.5   All Parents/ carers are made aware of the possibilities of staff members actions with regard to child protection procedures.

1.3.6   All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy.

1.3.7   Support will be provided for staff who may feel distressed from being involved with a case of abuse. These staff will be offered counselling.

1.4   Safeguarding Responsibilities

1.4.1   The Board will:
- ensure that the child protection policy and other related procedures are in place and up to date
- appoint a senior member of staff to act as the designated child protection officer
- nominate the Chief Executive to liaise with the child protection officer
- have in place safer recruitment procedures
- ensure that DBS checks are undertaken for everyone working with children
- undertake appropriate training about the ways of safeguarding children
- review the policy annually and make appropriate amendments

1.4.2   The SMT will:
- implement the policy
- monitor the policy
- report annually to the governing body through the Chief Executive on the effectiveness of the policy

1.4.3   The Child Protection Officer will:

- investigate and deal with all cases of suspected or actual problems associated with child protection
- keep up to date will all new guidance on safeguarding children
- keep all personnel up to date with any changes to procedures
- organise appropriate training for personnel
- ensure that all staff have awareness of and access to the London Child Protection procedures Edition 5 Part A
- liaise with the SMT
- annually review the policy with the SMT
- ensure that full and accurate chronological records are kept confidentially and are separate from the student records.
- ensure that an indication of further record-keeping is marked on student records
- be aware of the designated contact and procedure for child protection in each local area of operation
- ensure that any child who is subject to a child protection plan who is absent without explanation for two days is referred to Social Care.
- Ensure that where any child currently who is subject to a Child Protection Plan leaves, relevant information is transferred to the new provision immediately and that the child's social worker is informed.
- The designated Child Protection Officer is **Jo Green** and the deputies are **Debbie Jennings** and **Debbie Gowers**.

1.4.4   Staff must be:
- aware of this policy and procedures
- aware of the names of the designated CP Officers
- trained in identifying signs of harm and abuse
- know how to report any suspected case of harm or abuse
- kept up to date with changes in procedures
- prepared to attend a Strategy Meeting
- prepared to attend a Child Protection Case Conference

1.5   Safeguarding Confidentiality

1.5.1   Confidentiality is a very difficult issue but all personnel have a professional responsibility to share information with other professionals who are investigating a case.

1.5.2   A child, when confiding information to a member of staff, must be made aware that for the child's own sake this information cannot be kept secret

1.5.3   The child must be reassured that the information will only be shared with the Child Protection Officer, who will decide what will happen next.

1.5.4   All child protection records are regarded as confidential and will be kept in a secure place.

1.5.5   We work hard to establish excellent relations with all our parents. Parents are aware that we have a responsibility for the welfare of all our pupils and that we have a duty to involve Social Services if we have any concerns about a child.

1.5.6   Parents will be informed of our actions unless it puts the child at risk.

1.5.7   The Child Protection Officer will attend all Child Protection Case Conferences if appropriate.

1.5.8   The Child Protection Officer will attend all Core Group meetings once a child has been placed on the Child Protection Register, if it is felt to be appropriate

1.6   Safeguarding Training

1.6.1   We have identified the following staff training needs:
- Child Protection Course as part of induction to the organisation
- CPD for designated Child Protection Officers
- Positive Handling & Safe Intervention
- Safer Recruitment training for staff involved in the recruitment process
- All staff will receive updated training every year.

1.7   Supporting Children

1.7.1   We recognise that a child who is abused or witnesses violence may find it difficult to develop and maintain a sense of self worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self blame.

1.7.2   We recognise that the organisation may provide the only stability in the lives of children who have been abused or who are at risk of harm.

1.7.3   We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

1.7.4   Our organisation will support all pupils by:

- Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the organisation.
- Educating pupils on how to keep themselves safe, including on-line through teaching and learning opportunities as part of a rich and balanced curriculum. This may include covering relevant issues through Relationships Education and Relationships and Sex Education (RSE)
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Care as soon as there is a significant concern.
- Providing continuing support to a pupil about whom there have been concerns who leaves the organisation by ensuring that appropriate information is forwarded under confidential cover to the pupil's new place of education.

1.7.5   The Principal will make sure that they are satisfied that any children on the school roll placed with an alternative education provider can meet the needs of the child(ren) and obtain written confirmation that the appropriate safeguarding checks have been carried out.

1.8   Bullying

1.8.1   Our policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. A copy of the policy can be provided on request.

1.9   Allegations against staff

1.9.1   We understand that a child may make an allegation against a member of staff.

1.9.2   If such an allegation is made, the member of staff receiving the allegation or having the concern will immediately inform their senior member of staff.

1.9.3   On all such occasions the Child Protection officer will discuss the content of the allegation with Local Authority Designated Officer (LADO)

1.9.4   If the allegation made to a member of staff concerns the senior member of staff, the designated member of staff will immediately inform the Deputy Chief Executive or Chief Executive who will consult with the Local Authority Designated Officer (LADO).

1.9.5   As an organisation we follow the London Child Protection Procedures for dealing with allegations against staff. The procedure can be found here: http://www.londoncp.co.uk/chapters/alleg_staff.html

1.10   Whistle blowing

1.10.1   We recognise that children cannot be expected to raise concerns in an environment where staff fails to do so.

1.10.2   All staff are made aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.

1.10.3   Further information is available in our separate policy on whistle blowing, which can be provided on request.

1.11   Information Sharing

1.11.1   BEP Group follows the DfE "Information Sharing – advice for practitioners providing safeguarding services to children, young people, parent and carers" guidance and procedures.

1.11.2   The Designated Safeguarding Lead or staff generally will disclose information about a child or to other members of staff on a need to know basis only.

1.11.3   All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and follow the BEP Group Information Sharing procedures.

2.   Safer Recruitment

2.1   Safer Recruitment Aims

2.1.1   To ensure the practice of safe recruitment of personnel and volunteers.

2.1.2   To have in place a specific and strict procedure of recruitment in order to give maximum level of safety and reassurance of ability to the staff and Students and vulnerable adults when offering employment

2.2   Safer Recruitment Policy

2.2.1   We are committed to safeguarding and promoting the welfare of all children and we believe we have a duty to ensure safe recruitment of personnel and volunteer helpers to the organisation.

2.2.2   We wish to appoint the most suitable person for each vacant position regardless of age, marital status, sex, race, religion or belief, sexual orientation or disability. We intend deter, indentify and reject applicants who are unsuitable to work with children.

2.2.3   We believe our recruitment and selection process is systematic, efficient, effective and equal. All applicants must declare spent and unspent convictions, cautions and bind-overs, including those regarded as spent and have an Enhanced Criminal Records Disclosure as all posts are exempt from the Rehabilitation of Offenders Act 1974.

2.3   Safe Recruitment Procedure

2.3.1   When a post becomes vacant or is created then the following procedure takes place:
- **Job advertisement**
  - All posts will be advertised internally and externally (including agencies) in order to attract as wide a field of candidates as possible.
  - All advertisements for posts will state that the organisation is committed to safeguarding children and young people and all post holders are subject to a satisfactory enhanced Disclosure and Barring Services (DBS) disclosure.

- **Job Information Pack**

  - All agency applicants will be asked to supply a CV
  - All shortlisted agency applicants and any direct applicants will be provided with an application form, job description and person specification, and copies of the Safeguarding and Safe Recruitment Policies.

- **Short-Listing and References**

  - Applicants will be short-listed for the post if they suit the job description and person specification.
  - Immediately after short-listing, references will be requested for those candidates short-listed.
  - All referees will be asked if the candidate is suitable to work with children, has any disciplinary procedures relating to the safety and welfare of children, or any details of allegations/concerns/bad behaviour relating to the safety and welfare of children.
  - All references will be checked for consistent information.
  - The candidate will be asked to clarify any highlighted discrepancies.

- **The Interview**

  - All candidates will be asked to bring identity proof with them as required for a DBS Check
  - All applicants will undergo a face-to-face interview where questions pertaining to child protection will be asked.
  - All interviews will be conducted with a minimum of 2 people, one of which will have attended safer recruitment training. Where possible, three people will form the interview panel.
  - All candidates will be assessed for their suitability to the post and their capability to safeguard and protect the welfare of children and young people.

- **Pre - Employment Checks for the Successful Candidate**

  - Before taking up the post the following checks will be undertaken on the successful candidate:
    - References (2)
    - Proof of identity
    - List 99 checks
    - DBS Enhance Disclosure
    - Proof of a right to work in the UK

- **Induction**

  - The induction programme for all newly appointed personnel will include all organisational policies dealing with the safeguarding of children and young people and they will receive copies of the DFE guidance on Safe Working Practice.

2.3.2   We will keep a single central record of recruitment and record checks of:
- all staff
- all volunteers
- all work experience providers

2.5   Safer Recruitment Responsibilities

2.4.1   The Board has:
- the responsibility of ensuring that the safe recruitment process complies with DfE guidance and legal requirements
- delegated certain powers and responsibilities to the Chief Executive to oversee compliance with DfE guidance and legal requirements

- responsibility for the effective implementation, monitoring and evaluation of this policy

2.4.2 The C.E will:
- promote the safeguarding and welfare of children;
- ensure the organisation operates safe recruitment procedures
- ensure all appropriate pre-employment checks are completed
- ensure contractors and agencies comply with this policy
- ensure that relevant staff attend safer recruitment training
- monitor and evaluate the effectiveness of this policy

3. DBS Disclosure Checks

3.1 DBS Disclosure Checks Aims

3.1.1 To have in place clear procedures for DBS Disclosure checks for all personnel, volunteers and new appointments in order to ensure the safety and welfare of children and young people.

3.2 DBS Disclosure Checks Policy

3.2.1 We have in place clear procedures for DBS Disclosure checks for all personnel, volunteers and new appointments in order to ensure the safety and welfare of children and young people. We believe the safety and welfare of children and young people is paramount and we are fully committed to the procedures and arrangements of the Criminal Records Bureau and Independent Safeguarding Authority.

3.2.2 We understand that this policy complies with the current range of policies for 'Safeguarding Children and Safer Recruitment in Education', the School Staffing (England) the Education (Restriction of Employment), the Data Protection Act and the DBS code of Practice, also the ISA Vetting and Barring Scheme requirements.

3.2.3 We acknowledge the immense importance of the DBS in providing access to Disclosure checks for personnel, volunteer helpers and for new appointments.

3.2.4 Enhanced disclosures will be applied to the following categories:
- All staff
- Volunteers at our training centre
- Work Experience Providers for placements which run over 15 days, or who are sole traders
- Contractors

3.2.5 DBS disclosures will not be applied to the following as it is felt that they will have very little, if any, contact with children, they will be escorted whilst on our premises or school premises, or that they will work under the supervision of a teacher:
- Secondary pupils on work experience
- Work Experience providers for placements 15 days or under
- Occasional school event volunteers
- Contractors who are on site when children are not present

3.2.6 In compliance with the Education (Restriction of Employment) we will ensure that no new employee will commence their appointment without the completion of a List 99 check.

3.2.7 We will consider any person with a criminal record equally with others applying for any vacant post, or volunteering opportunity, unless their DBS disclosure check indicates that they present a risk to children.

3.3 DBS Disclosure Checks Responsibilities

3.3.1 The Board has:
- delegated powers and responsibilities to the Chief Executive Officer to ensure DBS disclosures are in place
- nominated the Chief Executive Officer to report back to the Board
- responsibility for the effective implementation, monitoring and evaluation of this policy

3.3.2 The SMT will:
- implement this policy
- ensure all personnel and volunteers are aware of it
- monitor and evaluate the effectiveness of this policy

3.4 Security of Information

3.4.1 In compliance with the DBS Code of Practice and the Data Protection Act all Disclosure information and records of all personnel will be safely handled, securely stored, retained and disposed of in a secure manner.

3.4.2 We have in place the Single Central Record, which records the receipt of all satisfactory DBS Disclosures.

4. Restraint of Students and vulnerable adults

4.1 Restraint of Students and vulnerable adults Aims

4.1.1 To make centre personnel aware that they can use reasonable force to restrain a pupil only in extreme circumstances.

4.2 Restraint of Students and vulnerable adults Policy

4.2.1 We acknowledge that Section 93 of the Education and Inspections Act 2006 allows staff to use reasonable force to restrain a student from doing, or continuing to do, any of the following:

- committing any offence (or, for a student under the age of criminal responsibility, what would be an offence for an older student);
- causing personal injury to, or damage to the property of, any person (including the student him/herself); or
- prejudicing the maintenance of good order and discipline at the school or among any Students and vulnerable adults receiving education at the school, whether during a teaching session or otherwise.

4.2.2 We understand that there is no legal definition when reasonable force can be used. 'That will always depend on the precise circumstances of individual circumstances of individual cases. To be judged lawful, the force used would need to be in proportion to the consequences it is intended to prevent. The degree of force used should be the minimum needed to achieve the desired result. Use of force could not be justified to prevent trivial misbehaviour'. (Department for Education– The Use of Force to Control or Restrain Pupils)

4.3   Restraint of Students and vulnerable adults Procedure

4.3.1   We have the following in place in order to reduce the likelihood of any member of staff using force:
- A calm, orderly and supportive school climate.
- Strong and effective relationships between Students and vulnerable adults and staff.
- An effective staff development programme that develops the skills of positive behaviour management.
- Identifying when an incident is going to happen.
- Using effective strategies to manage all incidents that occur.
- Informing a disruptive student that force may be used before using it.

4.3.2   All staff whose job involves supervising Students and vulnerable adults may use force to restrain a student only in extreme circumstances and only after training has been given.

4.3.3   All staff will receive training in student restraint.

4.4   Deciding whether to use force

4.4.1   We believe that the use of force and what force to use must always depend on the circumstances of each incident.

4.4.2   We acknowledge that when faced with an incident there is very little time for staff to think before making a quick but effective decision.

4.4.3   Staff must be aware of and consider the following:
- Assessing the seriousness of the incident that if force is not used then it could result in injury, damage or disorder.
- After considering alternatives for dealing with the situation, force is the only justifiable way of achieving a positive result.
- Assessing the number of risks connected with using force compared with using other strategies.

4.4.4   Types of Incidents
- Staff will have to make decisions when dealing with any of the following incidents:
  - **Fighting** - Students and vulnerable adults fighting.
  - **Attack** - a student attacks an adult or another student.
  - **Damage to property** – a student deliberately damages property or is about to.
  - **Injury or damage** – a student causes or is about to cause injury or damage.
  - **Absconding** – when a student tries to leave the school which could put his/her own safety at risk, the safety of others or the damage to property.
  - **Defying an instruction** – when a student persistently refuses to leave a classroom.
  - **Disruption of lessons** – when a student's behaviour seriously disrupts a lesson.
  - **Disrupting a school event** – when a student's behaviour seriously disrupts a school event.

4.4.5 When faced with an incident and before force is used, staff must:
- act in a calm and measured manner;
- show no anger or frustration;
- tell the student to stop misbehaving or restraint will be used but will stop when the student behaves.

4.4.6 Staff may use the following types of force:
- **passive physical contact** by standing between Students and vulnerable adults or by blocking a student's path;
- **active physical contact** by using restrictive holds, leading a student by the arm or hand or ushering a student away by placing a hand in the centre of the back.

4.4.7 Staff must make every effort not to harm a student or restrain a student that could be interpreted as sexually inappropriate conduct.

4.4.8 Risk assessments are in place for:
- a variety of potential incidents
- individual Students and vulnerable adults

4.4.9 Staff will be trained in the techniques of restraint when they join the centre and this training will be repeated every three years.

4.4.10 Records will be kept of all incidents on the appropriate incident record sheet. Parents will be informed by telephone and then by letter of the incident.

4.5 Post-incident support

4.5.1 After an incident has occurred the following procedure will take place:
- First aid if necessary
- Medical help if necessary
- Emotional support to Students and vulnerable adults and staff
- Discussions with parents

4.5.2 All complaints and allegations will be dealt with by using the procedures as stated in the Complaints Policy.

5. Supervision of Students and vulnerable adults

5.1 Supervision of Students and vulnerable adults Aims

5.1.1 To outline the safeguarding procedures in order to ensure full and appropriate supervision of all pupils throughout the school day.

5.2 Supervision of Students and vulnerable adults Policy

5.2.1 We have a legal duty of care to all our Students and vulnerable adults and the responsibility to ensure that we have in place safeguarding procedures for supervising Students and vulnerable adults throughout the school day in order to ensure their health, safety, welfare and good conduct.

5.2.2 We are aware that our responsibility of supervising Students and vulnerable adults begins when they arrive at school. Therefore, we will ensure that all parents are informed of the time that school starts and that Students and vulnerable adults should at least 10 minutes before the time when school starts.

5.2.3 We believe we have a duty of care to all school staff and adult volunteers. Therefore, we strongly advise that they should avoid supervising any student alone, at all times. If a one to one situation is unavoidable then school staff should take the necessary precautions beforehand to ensure that the situation is managed in a way that would not lead any reasonable person to question their motives or intentions.

5.3 Supervision of Students and vulnerable adults Responsibilities

5.3.1 The Board has:
- a legal duty of care for all pupils and to provide adequate supervision of Students and vulnerable adults throughout the school day;
- delegated powers and responsibilities to the Chief Executive to ensure that high standards of student behaviour and discipline are maintained throughout the school day whether it is on or off the school site;
- responsibility for the effective implementation, monitoring and evaluation of this policy

5.3.2 The Chief Executive will:
- be responsible for the internal organisation, management and control of the school;
- ensure the maintenance of good order and discipline at all times during the school day when Students and vulnerable adults are present on the school premises or on educational visits;
- ensure all school staff are aware and comply with this policy;
- ensure that all school staff are aware of their supervisory roles and responsibilities with Students and vulnerable adults during the school day;
- organise appropriate training for school staff;
- monitor the effectiveness of this policy;
- annually report to the Board.

5.3.3 Staff will:
- be aware of and comply with this policy;
- maintain good order and discipline among all Students and vulnerable adults safeguarding their health and safety when they are authorised to be on the school site and during educational visits;
- ensure that no class of Students and vulnerable adults should be left unsupervised;
- ensure they take the necessary precautions before undertaking any one to one supervision;
- record and report any incident or accident that could be considered a breach of supervision;

5.3.4 Students and vulnerable adults will:
- suggest ideas for devising a 'Break Time Code of Conduct';
- be reminded of staying safe during all break times;
- devise a programme of structured break time activities

5.3.5 The School Council will be involved in:
- determining this policy with the SMT;
- devising a 'Break Time Code of Conduct';
- discussing improvements to this policy during the school year;
- reviewing the effectiveness of this policy with the Board

5.3.6 Parents are asked to ensure that:
- their children arrive at school at least 10 minutes before school starts;
- they report their child's absence because of illness or for any other reason

5.4 Supervision of breaks

5.4.1 School staff will:
- be on duty 15 minutes prior to school begins;
- ensure that all Students and vulnerable adults enter the school building and go to their classes where their tutor and support staff will supervise them

5.4.2 Supervision at Break Times
The SMT will:
- ensure duty rotas are in place so that there is adequate supervision;
- ensure procedures and duties are clearly understood by all involved with student supervision;
- ensure duty tutors begin supervision promptly;
- act as line manager at break times when tutors and support staff are on duty;
- ensure good lines of communication are in place to ensure the overall safety of the Students and vulnerable adults at these times;
- ensure procedures for dealing with accidents are in place;
- ensure all accidents are recorded in the appropriate accidents books;
- ensure parents are notified of any accident, especially head injuries;
- ensure school staff are trained in emergency first aid
- ensure permission is obtained from parents for Students and vulnerable adults leaving during lunch breaks

5.4.3 Supervision during Off-site Visits
- The party leader will make all appropriate arrangements for supervision as outlined in the 'School Trips' policy

6. Student or vulnerable adult gone missing on or off site

6.1 Student gone missing on or off site Aims

6.1.1 To ensure that security procedures are in place to deal with the unlikely event of a missing student / vulnerable adult.

6.2 Student gone missing on or off site Policy

6.2.1 We believe it is essential to have in place exceptional security systems to prevent young people going missing from the school, or when they are on an educational visit.

6.3 Student / vulnerable adult gone missing on or off site Procedure

6.3.1 In the event that a student has gone missing **in** the centre:
- Inform the SMT
- Search the premises
- Check the CCTV footage
- Search the immediate area surrounding the training centre
- Contact the Student's or vulnerable adults parents /carers
- If the student is still not found then contact the police giving full details of the child / vulnerable adult
- Inform the school/LA
- When the student / vulnerable adult is found, review security procedures

6.3.3 When the student / vulnerable adult is found security procedures will be fully reviewed

6.3.4 All appropriate personnel must be trained in how to deal with a student / vulnerable adult going missing

6.4 Student / vulnerable adult gone missing on or off site Responsibilities

6.4.1 The Board has:
- appointed a Manager to put into practice security measures
- delegated powers and responsibilities to the Chief Executive to oversee all security measures
- responsibility for the effective implementation, monitoring and evaluation of this policy

6.4.2 The SMT will:
- ensure that security measures are in place and are effective
- ensure that all staff are aware of security procedures and the roles of staff
- notify parents of security procedures and the procedures for dealing with a missing student
- monitor and evaluate the effectiveness of this policy
- monitor security procedures;
- undertake/coordinate security risk assessments;
- consider all suggested ideas from school staff, parents, Students and vulnerable adults and visitors for improvement;
- inform parents of new and improved security measures

6.4.3 All staff will:
- be aware of and abide by this policy;
- undertake appropriate training in security procedures;

- inform and remind Students and vulnerable adults of security procedures such as the reporting of unidentified visitors;
- remind Students and vulnerable adults that they should not leave the premises or wander off while on an educational visit

6.4.4   Students and vulnerable adults must be aware of and abide by all security measures that are in place.

6.4.5   Parents must:
- ensure they provide correct and updated contact details;
- be aware of security procedures especially at the beginning and end of the day

6.4.6   Risk assessments are:
- in place in the event that a student should go missing on or off site
- reviewed if a student should go missing

6.5   Reducing the Risk of a Missing Student / vulnerable adult

6.5.1   All security procedures must be reviewed annually by the SMT. Everyday staff must be aware of the following:
- entrances and exits are secure
- windows are secure
- challenging and dealing with unauthorised people on the school sites
- outside lighting is switched on
- security of valuables and personal possessions
- visitors and contractors
- wearing identification badges
- carrying walkie-talkies

7. Vulnerable Students and vulnerable adults

7.1   Vulnerable Students and vulnerable adults Aims

7.1.1   To ensure that all staff are aware of their responsibilities for safeguarding and promoting the welfare of Students and vulnerable adults.

7.1.2   To have in place clear structured procedures to identify and report suspected cases of child abuse.

7.1.3   To provide support and guidance for pupils identified as being vulnerable.

7.2   Vulnerable Students and vulnerable adults Policy

7.2.1   We fully recognise our responsibilities for safeguarding and promoting the welfare of all Students and vulnerable adults by ensuring that all staff are able to identify and report possible cases of abuse and vulnerable children.

7.2.2   We consider children / adults to be vulnerable if they are:
- Looked After Children (LAC)
- Bullied/cyber bullied
- Students and vulnerable adults who go missing from home/school
- Suffering from neglect, physical abuse, sexual abuse or emotional abuse
- Suffering from bereavement
- Refugees/asylum seekers
- Experiencing drugs or alcohol abuse

- Students and vulnerable adults with a disability
- Excluded from school

7.2.3   We believe we have worked hard to create and maintain an ethos in which we provide support and guidance so that Students and vulnerable adults feel secure and confident enough to talk if they are experiencing difficulties. Students and vulnerable adults understand that we are prepared to listen to them as we value their viewpoints.

7.2.4   We ensure that all school staff receive regular training in safeguarding techniques so that we are able to recognise the signs and symptoms of suspected child abuse and that they are aware of the procedures of reporting such cases.

7.2.5   We have in place an effective system for monitoring those children identified as being vulnerable and excellent lines of communication with external support agencies.

7.2.6   We ensure that all staff are aware of their responsibilities for safeguarding and promoting the welfare of Students and vulnerable adults.

7.2.7   We have in place clear structured procedures to identify and report suspected cases of child abuse.

7.2.8   We provide support and guidance for pupils identified as being vulnerable.

7.3   Vulnerable Students and vulnerable adults Responsibilities

7.3.1   The Board has:
- appointed a member of staff to be the Coordinator for Safeguarding Children;
- nominated the Chief Executive Officer:
    - to visit the centres regularly and to liaise with the coordinator
    - to report back to the Board
    - to be familiar with local Area Safeguarding Committee procedures and LEA procedures

7.3.2   The C.E will:
- ensure the implementation of this policy;
- ensure that the recruitment policy is safe and effective;
- ensure that all school personnel and volunteers have undertaken DBS DBS checks;
- monitor the effectiveness of this policy

7.3.3   The coordinator will:
- be fully conversant in safeguarding procedures;
- ensure all personnel are aware of their responsibilities;
- ensure that all personnel are aware of the system of reporting suspected child abuse;
- report cases of suspected child abuse to social services;
- liaise with social services and other agencies;
- organise in-house training for personnel;
- attend training in order to keep up to date with new developments and resources;
- ensure all relevant and current documentation is up to date;
- review and monitor the effectiveness of this policy;

8. Dealing with Intruders

8.1 Dealing with Intruders Aims

8.1.1 To ensure the personal safety of Students and vulnerable adults, staff, volunteers and visitors by having in place procedures to deal with intruders to the building.

8.2 Dealing with Intruders Policy

8.2.1 We believe it is essential to have in place exceptional security systems to protect Students and vulnerable adults, staff, visitors and equipment. Parents need to feel confident that everything has been done to create a safe and secure working environment for their children. Our principal aim is to ensure the personal safety of the staff, Students and vulnerable adults, volunteers and visitors.

8.2.2 We are aware that all the above are vulnerable to assault from intruders while in the building or grounds. We believe that a person or a group of people found on the premises who have not followed correct visitor procedures can best be described as intruders. In such a situation staff are advised to assess whether the intruder is or is not a security risk before challenging the individual/s to establish their identity and the purpose of their 'visit'.

8.2.3 Staff must be aware that intruders might be visitors with legitimate business or they may be individuals who may pose a security risk. Staff have a duty to assist in the personal safety of others by dealing with all suspicious persons who appear on the premises or grounds in a calm non-confrontational manner.

8.2.4 We have a duty to make the general public aware that the school is not a public place to which they are entitled to have access. Any person who enters without permission is a trespasser and should be asked to leave. However, trespass is not a criminal offence but if a trespasser refuses to leave the premises, re-enters after being asked to leave or causes a disturbance he/she could be committing a criminal offence.

8.2.5 We will ensure the personal safety of Students and vulnerable adults, staff, volunteers and visitors by having in place procedures to deal with intruders to the building.

8.3 Dealing with Intruders Responsibilities

8.3.1 The Board has:
- appointed a Site Manager to put into practice security measures
- delegated powers and responsibilities to the Chief Executive to oversee all security measures and to report back to report back to the Board

8.3.2 The SMT will:
- ensure that security measures are in place and are effective
- ensure that all personnel are aware of procedures and their responsibilities to ensure a safe learning environment
- provide training on security procedures and how to deal with intruders for all school staff

- ensure Students and vulnerable adults are aware of security procedures and what they need to do when an intruder is identified on the premises
- ensure parents/carers are aware of security procedures
- monitor and evaluate the effectiveness of this policy

8.3.3 Staff must:
- comply with this policy;
- be aware of their responsibilities to ensure a safe learning environment
- be aware of security procedures such as how to protect Students and vulnerable adults from harm, guard against assault and safeguard property
- attend training in all of the above
- make Students and vulnerable adults aware of security procedures especially what they need to do when an intruder is identified on the premises
- report any identified intruders
- report any identified breaches in security

8.3.4 Staff, when dealing with an unidentified person on the premises must:
- be polite, calm and non-confrontational;
- ask the nature of their business
- escort or direct the person to the office if the nature of their business is legitimate
- ensure the visitor signs the visitors book and wears a visitors badge
- establish how the visitor breached security
- ask the intruder to leave if the reason is not legitimate
- act calmly and non-confrontational if the intruder appears to pose a threat by acting in an agitated, irrational manner and refuses to leave the premises
- seek support from other personnel who should call the police if the intruder refuses to co-operate
- remain calm and display non aggressive body language while remembering that the safety of the children is paramount
- not use force to evict or restrain the intruder
- try to direct the intruder away from areas occupied by children
- If the intruder displays a weapon:
  - back away from the intruder
  - reassure the intruder that the weapon is not necessary and it should be put away
  - not try to disarm the intruder
  - ensure that enough information is acquired in order to give a detailed description of the intruder to the police that's if the intruder leaves prior to the police arriving
- All staff who are not dealing with the intruder, but have been notified of his/her presence must remain with the Students and vulnerable adults in their care reassuring them, if need be, that they are safe and secure and are not in any danger

8.3.5 All Students and vulnerable adults will be made aware that any visitor not wearing the appropriate visitor's badge must be reported to a member of staff.

8.3.6 Parents / carers will be made aware of security procedures via the company website. All Parents / carers:
- must act like any other visitor to the school / centre
- must comply with security arrangements
- must not roam around the school / centre

- must not enter classrooms without permission
- must not disturb the duties of any member of staff
- will be banned from the premises if they cause a disturbance, are abusive or violent in any way

8.3.7   Visitors to school must:
- report to the office where they will be asked to sign in giving the reason for their visit
- wear a badge before they leave the office area
- not have free access of the premises
- be aware that they will be challenged by staff and pupils if they do not wear the appropriate badge

9. Security

9.1   School / Centre Security Aims

9.1.1   To protect Students and vulnerable adults, personnel, visitors, buildings, grounds and equipment from damage, arson and theft.

9.1.2   To provide a secure environment for Students and vulnerable adults, staff and visitors to the centre.

9.2   School / Centre Security Policy

9.2.1   We believe it is essential to have in place security systems to protect Students and vulnerable adults, staff, visitors and equipment. Parents need to feel confident that everything has been done to create a safe and secure working environment for their children.

9.2.2   Our principal aim is to ensure the personal safety of the whole centre community and to protect Students and vulnerable adults, personnel, visitors, buildings, grounds and equipment from damage, arson and theft.

9.3   Security Procedures

9.3.1   All security procedures will be reviewed annually by the SMT.

9.3.2   Each day school/centre staff must be aware of the following:
- entrances and exits are secure
- windows are secure
- challenging unauthorised people on the school site
- combustible material must be collected
- walkie talkies/alarms are switched on
- outside lighting is switched on
- security of valuables and personal possessions
- visitors and contractors
- wearing identification badges
- IT security and confidential information
- Personnel are carrying radios

9.3.3   Training will take place periodically for staff on all the above.

9.4 School / Centre Security Responsibilities

9.4.1 The Board has:
- delegated powers and responsibilities to the Chief Executive to oversee all school security measures;
- responsibility for the effective implementation, monitoring and evaluation of this policy

9.4.2 The CE will:
- ensure that security measures are in place and are effective;
- ensure that all personnel are aware of procedures;
- appoint new staff that are checked by the Criminal Records Bureau;
- monitor and evaluate the effectiveness of this policy

9.4.3 All staff will:
- be aware of and abide by this policy;
- undertake appropriate training in security procedures;
- inform and remind Students and vulnerable adults of security procedures such as the reporting of unidentified visitors who are on the site

9.4.4 Students and vulnerable adults must be aware of and abide by all security measures that are in place.

9.4.5 The Health and Safety Coordinator will:
- monitor security procedures;
- undertake/coordinate security risk assessments;
- consider all suggested ideas from personnel, governors, parents, pupils and visitors for improvement;

9.5 School Security Risk Assessments

9.5.1 The security risk assessment will cover the following:
- Students and vulnerable adults and personnel inside and outside the school / centre building
- entrances and exits
- evacuation procedures
- alarm systems
- fire safety
- dealing with intruders
- violence
- abduction of a pupil
- suspected bomb threat
- theft
- IT and Internet security

10. Visitors & Contractors

10.1 Visitors and Contractors Aims

10.1.1 To ensure that the premises are safe and that visitors to the school / centre come to no harm.

10.2 Visitors and Contractors Policy

10.2.1 We have a statutory duty under the Health and Safety at Work Act 1974, the Management of Health and Safety at Work Regulations 1999, the Disability Discrimination Act 1995 and a common law duty to ensure that, so far as reasonably practicable, that the premises are safe and that visitors to school come to no harm.

10.2.2 We require all visitors such as parents/carers, education officials, LA officials, contractors and others to report to the main office upon entering the premises. They will be welcomed in a cordial confidential, efficient and purposeful manner. Visitors will be asked to state the purpose of their visit, and to confirm their status by producing verifiable documentation.

10.2.3 When working on the premises, contractors have a duty to ensure the health and safety of everyone in the centre who may be affected by their work activities. Also, they have to cooperate with our health and safety policies and procedures.

10.2.4 We have a legal responsibility under the Management of Health and Safety at Work Regulations 1999 to ensure that all contractors when working on the premises act in a responsible and proper manner.

10.3 Visitors and Contractors Responsibilities

10.3.1 The Board has appointed a member of staff to be the Coordinator for Health and Safety and nominated the Chief Executive to liaise with the coordinator and to report back to the Board

10.3.2 The Chief Executive will:
- ensure the health and safety of all visitors to the centre by undertaking a Risk Assessment of the premises;
- ensure that all contractors when working on the premises cooperate with our health and safety policies and procedures;
- ensure that all contractors act in a responsible and proper manner;
- come to an agreement regarding how the contractor can work on the school premises during the school day;
- issue the code of conduct to contactors when quotations or tenders are invited
- gain agreement from the contractor to comply with the code as part of the condition of offer of work
- highlight the code during any pre start meeting
- check to ensure that this working agreement is fulfilled;
- monitor and review this policy

10.3.3 Staff will:
- take reasonable care of their own health and safety;
- take reasonable care of the health and safety of Students and vulnerable adults, visitors and contractors;
- be aware of the working agreement between BEP Group and any contractor undertaking work in the school

10.3.4 Visitors will:
- report to the school reception upon entering the premises;
- confirm their status by producing verifiable documentation;
- enter their details in the visitors book;
- wear a school visitors badge;
- abide by the visitors code of conduct;
- be familiar with the procedure of evacuating the school building in the event of an emergency;
- sign out when leaving the school

10.3.5 Contractors will:
- comply with all health and safety policies and procedures when working on the school premises;
- act in a responsible and proper manner;
- come to a working agreement regarding how they can work on the school premises during the day while Students and vulnerable adults are on site.;
- avoid contact with Students and vulnerable adults
- never be in contact with Students and vulnerable adults without school supervision
- stay within the agreed work area and access routes
- obtain permission if you need to go outside the agreed work area or access routes.
- keep staff informed of where you are and what you are doing
- not use profane or inappropriate language
- not bring inappropriate printed material onto the school site
- dress appropriately – shirts to be worn at all times
- observe the code at all times
- not take photographs whilst on site without prior consent
- remember that your actions, no matter how well intentioned, could be misinterpreted

11. Student / Client Illness

11.1   Student / Client Illness Aims

11.1.1 To have in place procedures to deal with all Students and vulnerable adults who become ill at the school / centre.

11.2   Student / Centre Illness Policy

11.2.1 We are committed to safeguarding and promoting the welfare of Students and vulnerable adults and we expect everyone connected with this company to share this commitment.

11.2.2 We have a duty to ensure the health and well being of all Students and vulnerable adults in order for them to be successful learners in a learning environment that is clean, healthy and safe for everyone. Therefore, it is our responsibility to deal with all Students and vulnerable adults who become sick in a kind and caring manner.

11.2.3 We believe that if a student is displaying signs of illness then a parent/carer has a duty not to send their child to school. Likewise, staff have a duty to assess the condition of any student who is thought to be unwell and to contact the parent/carer requesting the child should be taken home.

11.2.4 We are aware that all children are subject to coughs and colds at sometime and these should not prevent them from attending school. We do ask parents/carers not to send their children to school if they are showing signs of vomiting, diarrhoea, any type of rash, conjunctivitis, flu, chicken-pox, mumps, measles or high temperature.

11.2.5 We recognise the importance of working closely with parents/carers and we believe we have good lines of communication in place. But in order to ensure the health and well being of all Students and vulnerable adults, everyone must be aware of their role and responsibilities when a student is displaying signs of illness.

11.2.6 We believe it is only correct for a student suffering from an infectious or contagious disease to be excluded from the school until they are fully recovered. We have a duty of care for all Students and vulnerable adults and personnel and, therefore, we request parents to consult with their GP before their child returns to the school and if need be we will seek advice from the Local Health Authority.

11.3   Student / vulnerable adult's Illness Responsibilities

11.3.1 The Board has:
  - delegated powers and responsibilities to the Chief Executive to put into place procedures to ensure sick Students and vulnerable adults are identified and are cared for appropriately;
  - responsibility for the effective implementation, monitoring and evaluation of this policy

11.3.2 The CE will:
  - protect the health and safety of Students and vulnerable adults and personnel at all times;
  - ensure procedures are in place and effectively implemented to deal with Students and vulnerable adults taken ill at the school;
  - ensure school staff and parents are aware of this policy;

- organise first aid training for staff;
- ensure that Students and vulnerable adults records and emergency contact numbers are kept up to date;
- monitor the effectiveness of this policy

11.3.3 First Aid Trained Personnel will:
- ensure compliance with this policy;
- receive training in first aid at their induction and will attend periodic training to renew their first aid qualification;
- assess the condition of any student thought to be unwell, in a kind and caring manner;

11.3.4 Staff will:
- notify the student's school or carer of any child taken ill;
- immediately contact the student's parents/carers of their concerns about the child's health;
- ensure the comfort of an ill student by staying with them while awaiting the parents to arrive;
- seek immediate medical advice if a student is in danger;
- call for an ambulance if needed ;
- arrange for the parent/carer or school representative to escort a student to hospital
- ensure records are kept of all Students and vulnerable adults taken ill and sent home while at the school

11.3.5 Parents/carers must:
- be aware of this policy;
- comply with this policy;
- notify the nominated key worker of any changes to their contact details;
- co-operate with the school by keeping their child at home if they are unwell or showing any signs of vomiting, diarrhoea, any type of rash, conjunctivitis, flu, chicken-pox, mumps, measles or high temperature;
- consult with their GP if their child is suffering from one of the communicable diseases;
- inform the school if their child is not their normal self when attending school, but is not showing any signs of illness

12. Administering Medicines

12.1 Administering Medicines Aims

12.1.1 To outline the procedures for administering prescribed medicines to Students and vulnerable adults.

12.2 Administering Medicines Policy

12.2.1 We acknowledge that under the standard terms and conditions of employment there is no legal duty for staff to administer or to supervise a child taking medication.

12.2.2 Administration of medicines by any member of staff is undertaken purely on a voluntary basis and individual decisions will be respected. However, appropriate training will be provided before any member of the personnel who has volunteered and accepted this role to be familiar with all administration of medication procedures.

12.2.3 Medicines will only be administered that have been prescribed by a doctor, or some other authorised person and where it would be detrimental to a student's health if the medicine were not administered during the day. Non-prescription medicines will not be administered by staff, but parents/carers can make arrangements at lunchtime to administer the medication to their child.

12.3 Administering Medicines Responsibilities

12.3.1 The Board has:
- appointed a member of staff to be the Coordinator for Health and Safety
- nominated the CEO to liaise with the coordinator and to report back to the Board
- a responsibility for the effective implementation, monitoring and evaluation of this policy

12.3.2 The SMT will:
- ensure the administration of prescribed medicines by putting into practice effective strategies and examples of good practice
- inform parents of the policy during enrolment

12.3.3 Members of staff who have volunteered to administer or supervise the taking of medication will:
- undertake appropriate training;
- be up to date with the Individual Health Care Plans for those pupils with specific medical needs or emergency medication such as asthma inhalers or epi-pens

12.3.4 Parents/carers must provide:
- written permission for administration of medicines
- sufficient medical information on their child's medical condition
- the medication in its original container
- sufficient medicine for the dosage to be given in school

12.4   Administration of Prescribed Medicines

12.4.1   Members of staff who have volunteered to administer or supervise the taking of medication will:
- be aware of Individual Health Care Plans and of symptoms which may require emergency action
- read and check parental consent before administering or supervising the taking of medicines
- check that the medication belongs to the named student
- check that the medication is within the expiry date
- inform the parent if the medication has reached its expiry date
- confirm the dosage/frequency on each occasion and consult the medicine record form to prevent double dosage
- record on the medication record all relevant details of when medication was given
- return medications to the secure cabinet for storage
- always take appropriate hygiene precautions
- record when a pupil refuses to take medication
- immediately inform the parent/carer of this refusal

12.5   Medication Records

12.5.1   The following information must be supplied by the parent/carer:
- Name and date of birth of the child
- Name and contact details of the parent/carer
- Name and contact details of GP
- Name of medicines
- Details of prescribed dosage
- Date and time of last dosage given
- Consent given by parent/carer for staff to administer medication
- Expiry date of medication
- Storage details

12.6   Administering Medicines Security

12.6.1   All medications will be kept in a secure place and accessible only to the designated persons

12.7   Administering Medicines Educational Visits

12.7.1   On educational visits a designated person will also attend in order to administer medications

12.8   Administering Medicines Sporting Activities

12.8.1   We will ensure that pupils have immediate access to asthma inhalers during sporting activities during the day

13. Online Safety Policy

13.1 Introduction and Overview

Rationale

The purpose of this policy is to:

- Set out the key principles expected of all members of BEP Group with respect to the use of IT-based technologies.

- Safeguard and protect the children and staff.

- Assist BEP Group staff working with children to work safely and responsibly with the Internet and other IT and communication technologies and to monitor their own standards and practice.

- Set clear expectations of behaviour and/or codes of practice relevant to responsible use of the Internet for educational, personal or recreational use for the whole BEP Group community.

- Have clear structures to deal with online abuse such as online bullying [noting that these need to be cross referenced with other BEP Group policies].

- Ensure that all members of the BEP Group community are aware that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.

- Minimise the risk of misplaced or malicious allegations made against adults who work with students.

13.2 The main areas of risk for our BEP Group community can be summarised as follows:

13.2.1 **Content**

- Exposure to inappropriate content
- Lifestyle websites promoting harmful behaviours
- Hate content
- Content validation: how to check authenticity and accuracy of online content

13.2.2 **Contact**

- Grooming (sexual exploitation, radicalisation etc.)
- Online bullying in all forms
- Social or commercial identity theft, including passwords

13.2.3 **Conduct**

- Aggressive behaviours (bullying)
- Privacy issues, including disclosure of personal information
- Digital footprint and online reputation
- Health and well-being (amount of time spent online, gambling, body image)
- Sexting
- Copyright (little care or consideration for intellectual property and ownership)

13.3 Scope

This policy applies to all members of BEP Group (including staff, students/pupils, volunteers, parents/carers, visitors, community users) who have access to and are users of BEP Group IT systems, both in and out of BEP Group

13.4 Roles and responsibilities

13.4.1 The Board will:

- Ensure that the online safety policy and other related procedures are in place and up to date
- To lead a safeguarding culture ensuring that online safety is fully integrated into safeguarding as a whole
- Nominate the Chief Executive to liaise with the Safeguarding Officer

13.4.2 The SMT will:

- Implement the policy
- Monitor the policy with the Safeguarding lead
- Report annually on the effectiveness of the policy
- To ensure Trustees are regularly updated on the nature and effectiveness of the BEP Group's arrangements for online safety
- Ensure suitable 'risk assessments' are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- Ensure BEP Group uses appropriate IT systems and services
- Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- Ensure that there is a system in place to monitor and support staff who carry out internal online safety procedures, e.g. network manager
- Take overall responsibility for online safety provision

13.4.3 The Child Protection Officer Will:

- Be adequately trained in off-line and online safeguarding, in-line with statutory guidance and relevant Local Safeguarding Children Board (LSCB) guidance
- Lead a 'safeguarding' culture, ensuring that online safety is fully integrated with whole BEP Group safeguarding.
- Be aware of procedures to be followed in the event of a serious online safety incident
- Promote an awareness and commitment to online safety throughout the BEP Group community
- Take day to day responsibility for online safety issues and a leading role in establishing and reviewing the BEP Group's online safety policy/documents
- Ensure that online safety education is embedded within the curriculum
- Liaise with BEP Group technical staff where appropriate
- To communicate regularly with SMT and the designated online safety Governor/committee to discuss current issues, review incident logs and filtering/change control logs
- To ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident
- To ensure that online safety incidents are logged as a safeguarding incident
- Facilitate training and advice for all staff
- Oversee any pupil surveys / pupil feedback on online safety issues
- Support BEP Group in encouraging parents and the wider community to become engaged in online safety activities
- Liaise with the Local Authority and relevant agencies
- Is regularly updated in online safety issues and legislation, and be aware of the potential for serious child protection concerns

13.4.4 The Teaching and Learning Manager will:

- Oversee the delivery of the online safety element of the Computing curriculum

13.4.5 The Network Manager / technician will:

- To report online safety related issues that come to their attention, to the Safeguarding officer
- To manage BEP Group's computer systems, ensuring:
- BEP Group's password policy is strictly adhered to.
- Systems are in place for misuse detection and malicious attack (e.g. keeping virus protection up to date)
- access controls/encryption exist to protect personal and sensitive information held on BEP Group owned devices
- BEP Group's policy on web filtering is applied and updated on a regular basis
- That they keep up to date with the BEP Group online safety policy and technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- That the use of BEP Group technology and online platforms are regularly monitored and that any misuse/attempted misuse is reported to the online safety co-ordinator/Safeguarding Lead
- To ensure appropriate backup procedures and disaster recovery plans are in place
- To keep up-to-date documentation of the BEP Group's online security and technical procedures

13.4.6 Teaching staff will:

- Embed online safety in the curriculum
- Supervise and guide pupils carefully when engaged in learning activities involving online technology (including, extra-curricular and extended BEP Group activities if relevant)
- Ensure that pupils are fully aware of research skills and are fully aware of legal issues relating to electronic content such as copyright laws

13.4.7 All staff, volunteers and contractors will:

- Report any suspected misuse or problem to the online safety coordinator
- Maintain an awareness of current online safety issues and guidance e.g. through CPD
- Model safe, responsible and professional behaviours in their own use of technology

13.5   Communication

The policy will be communicated to staff/pupils/community in the following ways:

- Policy to be part of BEP Group induction pack for new staff
- Regular updates and training on online safety for all staff
- Acceptable use agreements signed by staff, volunteers, students and parents / carers as part of the induction process

13.6   Handling Incidents

- BEP Group will take all reasonable precautions to ensure online safety
- Staff and pupils are given information about infringements in use and possible sanctions.
- The Safeguarding Lead acts as first point of contact for any incident
- Any suspected online risk or infringement is reported to Safeguarding Lead that day
- Any concern about staff misuse is always referred directly to the CEO, unless the concern is about the CEO in which case the compliant is referred to the Chair of Trustees and the LADO (Local Authority's Designated Officer).

13.7 Education and Curriculum

Pupil online safety curriculum

BEP Group:

- Has a clear, progressive online safety education programme as part of the Computing curriculum/PSHE and other curriculum areas as relevant. This covers a range of skills and behaviours appropriate to their age and experience;
- Plans online use carefully to ensure that it is age-appropriate and supports the learning objectives for specific curriculum areas;
- Will remind students about their responsibilities through the Student and Parent Handbook
- Ensures staff are aware of their responsibility to model safe and responsible behaviour in their own use of technology, e.g. use of passwords, logging-off, use of content, research skills, copyright;
- Ensures that staff and pupils understand issues around plagiarism; how to check copyright and also know that they must respect and acknowledge copyright/intellectual property rights;
- Ensure pupils only use BEP Group-approved systems and publish within appropriately secure / age-appropriate environments.

13.8 Staff training

BEP Group:
- Makes regular training available to staff on online safety issues
- Provides, as part of the induction process, all new staff [including those on university/college placement and work experience] with information and guidance on the Online Safety Policy and the BEP Group's Acceptable Use Agreements.

13.9 Parent awareness

BEP Group:

- Provides induction for parents which includes online safety

13.10 Expected conduct and Incident management

13.10.1 Expected conduct

In BEP Group, all users:
- Are responsible for using the BEP Group IT and communication systems in accordance with the relevant Acceptable Use Agreements;
- Understand the significance of misuse or access to inappropriate materials and are aware of the consequences;
- Understand it is essential to reporting abuse, misuse or access to inappropriate materials and know how to do so;
- Understand the importance of adopting good online safety practice when using digital technologies in and out of BEP Group;
- Know and understand BEP Group policies on the use of mobile and hand held devices including cameras

13.10 Staff, volunteers and contractors

- Know to be vigilant in the supervision of children at all times, as far as is reasonable, and uses common-sense strategies in learning resource areas where older pupils have more flexible access;
- Know to take professional, reasonable precautions when working with pupils, previewing websites before use; using age-appropriate (pupil friendly) search engines where more open Internet searching is required with younger pupils

13.11 Parents/Carers

- Should provide consent for students to use the Internet, as well as other technologies, as part of the Parent Consent form
- Should know and understand what BEP Group's 'rules of appropriate use for the whole BEP Group community' are and what sanctions result from misuse.

13.12 Incident Management

In BEP Group:
- There is strict monitoring and application of the online safety policy and a differentiated and appropriate range of sanctions
- All members of BEP Group are encouraged to be vigilant in reporting issues, in the confidence that issues will be dealt with quickly and sensitively, through BEP Group's escalation processes
- Support is actively sought from other agencies as needed (i.e. the local authority, LGfL, UK Safer Internet Centre helpline, CEOP, Prevent Officer, Police, IWF) in dealing with online safety issues
- Monitoring and reporting of online safety incidents takes place and contribute to developments in policy and practice in online safety within BEP Group;
- Parents/carers are specifically informed of online safety incidents involving young people for whom they are responsible;
- The Police will be contacted if one of our staff or pupils receives online communication that we consider is particularly disturbing or breaks the law
- We will immediately refer any suspected illegal material to the appropriate authorities

13.13 CCTV

- We have CCTV in BEP Group as part of our site surveillance for staff and student safety. The use of CCTV is clearly signposted in BEP Group. We will not reveal any recordings without appropriate permission.

13.14 Digital images and video

In BEP Group:
- We gain parental/carer permission for use of digital photographs or video involving their child as part of the BEP Group agreement form when their daughter/son joins BEP Group (or annually)

- We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published BEP Group produced video materials/DVDs

- Staff sign the BEP Group's Acceptable Use Policy and this includes a clause on the use of mobile phones/personal equipment for taking pictures of student's detailed within the Staff Code of Conduct

- If specific student photos (not group photos) are used on the BEP Group web site, in the prospectus or in other high profile publications the BEP Group will obtain individual parental or student permission for its long term, high profile use

- BEP Group blocks/filter access to social networking sites unless there is a specific approved educational purpose

- Students are taught about how images can be manipulated in their online safety education programme and also taught to consider how to publish for a wide range of audiences which might include governors, parents or younger children as part of their computing scheme of work;

- Students are advised to be very careful about placing any personal photos on any 'social' online network space. They are taught to understand the need to maintain privacy settings so as not to make public, personal information.

- Students are taught that they should not post images or videos of others without their permission. We teach them about the risks associated with providing information with images (including the name of the file), that reveals the identity of others and their location. We teach them about the need to keep their data secure and what to do if they are subject to bullying or abuse

Dealing with Disclosure

If a young person actually makes a disclosure to you, follow the procedure below:

1. **STOP**: Ensure that the young person understands that you are unable to keep information confidential if you are concerned for their safety and well being. *Never promise to keep a secret, even if this means the young person is no longer willing to disclose.* You could say something like 'I'm sorry, but if you tell me anything that makes me worried for your safety, I will have to pass that information on.' Explain what would happen next. If at this point, the young person decides not continue with the disclosure, what has already been disclosed should be discussed with your line manager and details logged on an 'Incident Report - No further action required' and emailed to the Child Protection Officer to review and store in the safeguarding log. The young person should be informed that this will happen.***Remember – never press the young person for details.***

2. **LOOK:** Be alert to signs of abuse or neglect with the young person. This may include marks on a young person, changes in behaviour or mood, or a decline in their physical presentation.

3. **LISTEN:** carefully to what you are being told. *Do not ask any leading questions* (These are questions in which you suggest a possible answer e.g. "Did A do this to you?" rather than "What happened to you?") This is especially important as it could affect the outcome of any investigation. Reassure the young person that all information will be kept in confidence unless they are at risk of harm, and even then information will only be disclosed to those who need to know to support them.

4. **DISCUSS:** Ask the young person if they have any specific outcomes they want to achieve. Go through possible options (including specialist advisers) and talk through next steps and what could happen.

5. **RECORD:** The Safeguarding Log is securely kept electronically by the Child Protection Officer. Even if no action has been taken, all concerns must be recorded on an incident form clearly marked 'Safeguarding' form. Any records must be factual – do not include information if you are not sure if it's factual. Copies of the incident form are on the intranet; however it may not be appropriate to complete it at the time. Take notes if possible and then as soon as possible complete the Incident Report, clearly marking it 'Safeguarding'. The following areas should be covered where possible:
    - The young person's personal details (name, age, ethnicity, special needs, if any communication difficulties etc)
    - The date, time and place of any incident and your factual observations
    - The nature of the suspected abuse
    - What was observed, e.g. marks, injuries, unusual behaviours
    - What was said by the young person
    - Whether any other person was involved
    - What was said to the young person
    - What was said by any other person, e.g. parent, sibling, other child or young person, or colleague
    - The referrer's professional relationship to the family
    - Action taken at the time
    - Nature of discussion with manager
    - Subsequent action taken

6. Email the Child Protection Officer so that the BEP Group Reporting Procedure can be followed. *You must always pass on this information on the day of disclosure*

What is Abuse?

'Working together to Safeguard Children' sets out definitions and examples of the four broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child does frequently suffer more than one type of abuse:

- **Physical abuse** may take many forms e.g. hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness in a child.

- **Emotional Abuse** is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development and may involve:
  - ❖ Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
  - ❖ Imposing developmentally inappropriate expectations. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the children participating in normal social interaction.
  - ❖ causing children to feel frightened or in danger – e.g. witnessing domestic violence
  - ❖ Exploitation or corruption of children.

  Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone.

- **Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening and includes penetrative (e.g. rape, buggery or oral sex) and non-penetrative acts. It may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic materials or sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

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

Further types of abuse

Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE) including County lines:

> *"Both CSE and CCE are forms of abuse and power and both occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.*

Keeping Children Safe in Education (DfE, 2020)

Child Exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs, weapons and money for them. Key to identifying potential involvement may be 'missing episodes' when the victim may have been trafficked for the purpose of transporting drugs, weapons or money.

Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE and CCE and will take appropriate action to respond to any concerns. The Designated Safeguarding Lead (DSL) will lead on any concerns and work with other agencies as appropriate. The DSL will consider a referral using the Local Authority pathways or a direct referral using the National Referral mechanism for human trafficking.

Serious Violence

There are a number of indicators, which may signal that a child is at risk from, or involved with serious violent crime. These may include increased absence from school, a change in friendships, or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change of attitude or well-being or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

Domestic Violence

The cross government definition of domestic violence and abuse is: any incident of pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged over 16 who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: physical; sexual; financial; and emotional.

Children can witness and be adversely affected by domestic abuse. Exposure to domestic abuse and/or violence can have a serious long lasting emotional and psychological impact

Honour Based abuse

So-called honour based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community including Female Genital Mutilation (FGM), forced marriage and such practices such as breast ironing.

Female Genital Mutilation (FGM):

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should BEP Group staff physically examine pupils. Unless there are exceptional circumstances, concerns about FGM should be taken to the DSL, rather than the police. Our school will operate in accordance with the statutory requirements relating to FGM in line with the London Child Protection Procedures.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Forced marriage

A forced marriage is one that is entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion is used and is a crime. Our staff understand how to report concerns where this may be an issue.

Prevent, Radicalisation and Extremism:
BEP Group's duty under the counter terrorism and security act.

As part of the Counter Terrorism and Security Act 2015, BEP Group have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.
We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the BEP Group's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

BEP Group commits to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of children and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion;

- be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas and;

- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

Sexting:

The term 'sexting' relates to the sending of indecent images, videos and/or written messages with sexually explicit content. These are created and sent electronically. They are often 'shared' via social networking sites and instant messaging services. This BEP Group will not tolerate sexting, it is inappropriate and illegal amongst young people and can have extremely damaging and long-lasting consequences. Sexting is unacceptable behaviour. The misuse of electronic communication, such as sexting, inappropriate comments on Facebook, being the object of cyber-bullying and online grooming are all potential safeguarding concerns. We have a responsibility to work with parents and carers in ensuring that all pupils are fully aware of the dangers and possible repercussions of sexting.

Mental Health

Mental health is the concern of the whole community and we recognise that schools play a key part in this. Our school wants to develop and protect the emotional wellbeing and resilience of all children and staff, as well as provide specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resilience. The more risk factors present in an individual's life, the more protective factors or supportive interventions are required to promote further growth and resilience. It is recognised that young people that may be suffering from mental ill-health and are at risk of self harm or suicide may present in school as making good progress and achieving well. It is therefore vital that we work in partnership with parents and carers to support the well-being of our children. It is equally important that parents share any concerns about the well-being of their child with school, so appropriate support and interventions can be identified and implemented.

Where there are concerns that a child or young person may be self- harming, it will be taken seriously as this may indicate an increased risk of suicide either intentionally or by accident. If a child discloses self-harm or found to be self-harming the Designated Safeguarding Lead (DSL) or relevant key person will take the time to establish any underlying concerns.

The child will be supported to access services using the appropriate Local Authority help and support pathways.

Children requiring mental health support

Mental Health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We have systems in place for identifying possible mental health problems and work in partnership with external agencies including the Local Authority and CAMHs to support children and their families.

Possible Signs & Symptoms of Abuse

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered. This is not an exclusive list and many of the signs and symptoms could fall into more than one category. Guidance on recognising signs & symptoms of can be found in Working Together to Safeguard Children. Also students with learning difficulties often exhibit some of these signs (e.g. reluctance to get undressed for P.E., constant tiredness) which are not necessarily signs of abuse but symptoms of their condition. However, it must also be remembered that disabled children are 3 times more likely to experience abuse or neglect than non-disabled peers.

Physical Abuse
- Unexplained injuries, bites, bruises or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss the causes of injuries
- Untreated injuries
- Disclosure of punishment which appears excessive
- Withdrawal from physical contact/aggressive behaviour
- Arms & legs kept covered in hot weather (excluding for reasons of cultural dress
- Fear of returning home
- Fear of medical help
- Self-destructive tendency
- Running away

Emotional Abuse
- Physical, mental, emotional or developmental lag
- Domestic violence
- Disclosure of punishment which appears excessive
- Over-reaction to making mistakes or fear of punishment
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate responses to painful situations
- Neurotic behaviours
- Self-harm
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug or solvent abuse
- Running away
- Compulsive stealing, scavenging

Sexual Abuse
- Sudden changes in behaviour
- Displays of affection which are inappropriate
- Alleged promiscuity or sexualised behaviour
- Fear of undressing
- Regression to younger behaviour
- Inappropriate internet use and possible 'grooming' concerns
- Genital itching or other genital/anal pain/injury
- Distrust of familiar adult
- Unexplained gifts of money, mobile phones etc.
- Depression and withdrawal
- Apparent secrecy about social activities or the identity of "special friends"
- Wetting or soiling, day and night
- Sleep disturbances or nightmares
- Chronic illness, especially throat infections and sexually transmitted disease

Neglect
- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness or non-attendance at BEP Group
- Untreated medical problems or unmet special needs
- Low self-esteem
- Neurotic behaviour
- Poor social relationships
- Deterioration in BEP Group performance
- Running away
- Compulsive stealing or scavenging

Peer on peer abuse

Children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

- sexual violence such as rape, assault by penetration and sexual assault

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse

- sexting (also known as youth produced sexual imagery)

- initiation/hazing type violence and rituals.

Upskirting

Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Upskirting, from 12 April 2019, is a criminal offence.

Child sexual exploitation (CSE)

An imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Staff should be aware of the key indicators of children being sexually exploited which can include:
 - Going missing for periods of time or regularly coming home late;
 - Regularly missing BEP Group or education or not taking part in education;

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections;
- Mood swings or changes in emotional wellbeing;
- Drug and alcohol misuse; and
- Displaying inappropriate sexualised behaviour.

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:
Inappropriate relationships:
Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend:
Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.

Organised exploitation and trafficking:
Victims are trafficked through criminal networks – often between towns and cities – And forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Female Genital Mutilation (FGM)

Risk factors for FGM include:

- Low level of integration into UK society

- Mother or a sister who has undergone FGM

- Girls who are withdrawn from PSHE

- Visiting female elder from the country of origin

- Being taken on a long holiday to the country of origin

- Talk about a 'special' procedure to become a woman

Symptoms of FGM

- FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-BEP Group to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

- Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.

- Spending longer than normal in the bathroom or toilet due to difficulties urinating.

- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.

- Frequent urinary, menstrual or stomach problems.

- Prolonged or repeated absences from BEP Group or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.

- Reluctance to undergo normal medical examinations.

- Confiding in a professional without being explicit about the problem due to embarrassment or fear.

- Talking about pain or discomfort between her legs.

Prevent, Radicalisation and Extremism:

Recognising Extremism - Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes

- Glorifying violence, especially to other faiths or cultures

- Making remarks or comments about being at extremist events or rallies outside BEP Group

- Evidence of possessing illegal or extremist literature

- Advocating messages similar to illegal organisations or other extremist groups

- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

- Secretive behaviour

- Online searches or sharing extremist messages or social profiles

- Intolerance of difference, including faith, culture, gender, race or sexuality

- Graffiti, art work or writing that displays extremist themes

- Attempts to impose extremist views or practices on others

- Verbalising anti-Western or anti-British views

- Advocating violence towards others

Handling sexting and nude selfie incident:

UKCCIS "Sexting in BEP Group and colleges" will be used to triage concerns. This extract gives the initial actions that should be taken:
There should always be an initial review meeting, led by the DSL.

This should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people

When assessing the risks the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?

- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?

- Are there any adults involved in the sharing of imagery?

- What is the impact on the pupils involved?

- Do the pupils involved have additional vulnerabilities?

- Does the young person understand consent?

- Has the young person taken part in this kind of activity before?

- If a referral should be made to the police and/or children's social care

- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed.

- What further information is required to decide on the best response?

- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.

- Whether immediate action should be taken to delete or remove images from devices or online services.

- Any relevant facts about the young people involved which would influence risk assessment.

- If there is a need to contact another BEP Group, college, setting or individual.

- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved.

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

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

If none of the above apply then BEP Group may decide to respond to the incident without involving the police or children's social care (BEP Group can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the Designated Safeguarding Lead is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the BEP Group's pastoral support and disciplinary framework and if appropriate local network of support.

Judging whether harm is significant is not a straightforward task. The kind of factors that are considered are:

- The degree and extent of physical harm. A single traumatic event such as a violent assault or poisoning may constitute significant harm, or a pattern of less serious events.

- The extent of pre meditation by the carer. A single loss of temper, without serious consequence, followed by remorse and reconciliation, would cause less concern than a pre meditated act.
- Whether the alleged perpetrator accepts responsibility for what they have done and accepts that it was wrong.
- Whether the child or young person shows fear or anxiety in the presence of carers, or displays unusual, immature or inappropriate behaviour. This would cause more concern than an incident in a normally loving, stable relationship between carer and young person.
- Long term concerns about possible emotional abuse or neglect, which have been resistant to attempts to help.

Appx 3

SAFEGUARDING YOUNG PEOPLE

<u>**What to do with your Child Protection concern**</u>

Refer to a Safeguarding Officer. If no officer is available then speak to a member of the Senior Management Team. Otherwise contact the relevant LA direct (see intranet for contact Details)

Safeguarding Officers:

- *Jo Green (DSL)*
  07971 147751

- *Debbie Jennings (IC2)*
  07931 458100

- *Debbie Gowers (IC3)*
  07495 777654

- *Susan Francis(IC4)*
  07708 374675

You can also access the London Child Protection Procedures at:

Appx 4

Online Safety Infringements

How will infringements be handled?

Whenever a student or staff member infringes the Online-Safety Policy, the final decision on the level of sanction will be at the discretion of BEP Group management and will reflect the BEP Group behaviour and disciplinary procedures.

The following are provided as **_exemplification_** only:

STUDENT	
Category A infringements	**Possible Sanctions:**
• Use of non-educational sites during lessons • Unauthorised use of email • Unauthorised use of mobile phone (or other new technologies) in lessons e.g. to send texts to friends • Use of unauthorised instant messaging / social networking sites	**Refer to Key Worker** Escalate to: Centre Manager
Category B infringements	**Possible Sanctions:**
• Continued use of non-educational sites during lessons after being warned • Continued unauthorised use of email after being warned • Continued unauthorised use of mobile phone (or other new technologies) after being warned • Continued use of unauthorised instant messaging / chatrooms, social networking sites, NewsGroups • Use of Filesharing software e.g. Napster, Vanbasco, BitTorrent, LiveWire, etc • Trying to buy items over online • Accidentally corrupting or destroying others' data without notifying a member of staff of it • Accidentally accessing offensive material and not logging off or notifying a member of staff of it	**Centre Manager / Senior Manager / Safeguarding lead** Escalate to: removal of Internet access rights for a period / removal of phone until end of day / contact with parent]

STUDENT	
Category C infringements	**Possible Sanctions:**
• Deliberately corrupting or destroying someone's data, violating privacy of others or posts inappropriate messages, videos or images on a social networking site. • Sending an email or MSN message that is regarded as harassment or of a bullying nature (one-off) • Trying to access offensive or pornographic material (one-off) • Purchasing or ordering of items online • Transmission of commercial or advertising material	**Refer to Centre Manager/ Online-Safety Coordinator / CEO / removal of Internet and/or Learning Platform access rights for a period** Escalate to: contact with parents / removal of equipment **Other safeguarding actions if inappropriate web material is accessed:** Ensure appropriate technical support filters the site
Category D infringements	**Possible Sanctions:**
• Continued sending of emails or MSN messages regarded as harassment or of a bullying nature after being warned • Deliberately creating accessing, downloading or disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent • Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of the Data Protection Act, revised 1988 • Bringing the school name into disrepute	**Refer to Centre Manager / Safeguarding Lead/ Deputy CEO/ Contact with parents** **Other possible safeguarding actions:** • Secure and preserve any evidence • Inform the sender's e-mail service provider. • Liaise with relevant service providers/ instigators of the offending material to remove • Report to Police / CEOP where child abuse or illegal activity is suspected

STAFF	
Category A infringements (Misconduct)	**Possible Sanctions:**
• Excessive use of Internet for personal activities not related to professional development e.g. online shopping, personal email, instant messaging etc. • Use of personal data storage media (e.g. USB memory sticks) without considering access and appropriateness of any files stored. • Not implementing appropriate safeguarding procedures. • Any behaviour on the World Wide Web that compromises the staff members professional standing in the school and community. • Misuse of first level data security, e.g. wrongful use of passwords. • Breaching copyright or license e.g. installing unlicensed software on network.	**Referred to line manager / Deputy CEO** Escalate to: *Warning given*
Category B infringements (Gross Misconduct)	**Possible Sanctions:**
• Serious misuse of, or deliberate damage to, any BEP Group / Company computer hardware or software; • Any deliberate attempt to breach data protection or computer security rules; • Deliberately creating ,accessing, downloading and disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent; • Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of the Data Protection Act, revised 1988; • Bringing the school name into disrepute	**Referred to CEO** **Other safeguarding actions:** ▪ Remove the PC to a secure place to ensure that there is no further access to the PC or laptop. ▪ Instigate an audit of all ICT equipment by an outside agency, such as BEP Group ICT managed service providers - to ensure there is no risk of students accessing inappropriate materials at BEP Group ▪ Identify the precise details of the material. *Escalate to:* Report to Police / CEOP where child abuse or illegal activity is suspected. ,

If a member of staff commits an exceptionally serious act of gross misconduct

The member of staff should be instantly suspended. Normally though, there will be an investigation before disciplinary action is taken for any alleged offence. As part of that the member of staff will be asked to explain their actions and these will be considered before any disciplinary action is taken.

BEP Group are likely to involve external support agencies as part of these investigations e.g. an ICT technical support service to investigate equipment and data evidence.

Child abuse images found

In the case of Child abuse images being found, the member of staff should be **immediately suspended** and the Police should be called.

Anyone may report any inappropriate or potentially illegal activity or abuse with or towards a child online to the Child Exploitation and Online Protection (CEOP):

http://www.ceop.gov.uk/reporting_abuse.html

http://www.iwf.org.uk

How will staff and students be informed of these procedures?

- They will be fully explained and included within the school's Online-Safety / Acceptable Use Policy. All staff will be required to sign the BEP Group online-safety acceptable use agreement form;
- Students will be taught about responsible and acceptable use and given strategies to deal with incidents so they can develop 'safe behaviours'. Students will sign an age appropriate online-safety / acceptable use agreement form;
- The BEP Group online-safety policy will be made available and explained to parents, and parents will sign an acceptance form when their child starts at BEP Group
- Information on reporting abuse / bullying etc will be made available by BEP Group for students, staff and parents.