



BEP Group: Policy Pack

staff, volunteers, learners & consultants



Safeguarding Policies and Procedures

Last Review: August 2023, Next Review: August 2024

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 'Child-on-child' 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 1.7.1 additional bullet regarding safer recruitment 1.8.5 additional bullet referring to RSE 1.8.5 new section added referring to alternative provision Annex 2 - additional types of abuse added covering all those added in KCSIE20
09/08/21	SF	KCSIE statement Page 3 amended to include updated 2021KCSIE statement Contents amended to reflect changes Date at Bottom of page 6 amended to KCSIE Sept 21 Working together to safeguard children to include Dec 2020 update on Page 6 Edition of LSCP changed to 6 th Edition School policies on page 4 amended to reflect updated policies Section1 statement paragraph 2 updated Section 1.2.8 added text "policies listed above." Section 1.3.3 updated to include peer on peer abuse Section 1.3.4 updated to latest KCSIE version Section 1.3.5 added link to londoncp.co.uk Section 1.3.6 amended to say "safeguarding team" Addition of section 1.3.7 to include 1:1 situations and whistleblowing Amended section 1.3.8 to reflect Local authority Updated section 1.3.11 regarding informing parents to include exceptions Updated section 1.3.13 to include staff supervision Removed original Section 1.3.9 of section as no longer required (renumbered as appropriate). Section 1.4.1 updated to include safeguarding and online safety in the curriculum Section 1.4.2 amended the word 'board' to 'Trustees' Section 1.4.3 addition of bullet points 10 and 11 to reflect impact attendance has on education and mental health support Section 1.4.3 removal of Debbie Gowers and addition o Kelly Sims as DSL / CPO Section 1.5 additional safeguarding needs added – amendment of numbering moving forward Section 1.6.2 sharing of information updated Removed Section 1.6.3 of section as no longer required. Section 1.6.5 amended to include exceptions Section 1.7 amended to say, 'whilst not exhaustive' Section 1.8.4 added to reflect vulnerable children being less able to access support Section 1.9 added Early Help Section 1.10 added Private Fostering Section 1.11 added managing with child protection cases Section 1.12.2 added to include bullying motivated by perceived differences Section 2.2.4 amended with the latest policies Section 2.3.2 updated to include trustees and regular contractors Section 3.2.4 updated to include trustees Amended entire Section 8 to Critical Incident policy (Removal of dealing with an intruder section (duplicated)) Section 9.5.1 amended to include critical incident added to list of risk assessments Section 11.1.2 added to include Covid-19 Risk assessment in place Section 13.7 Pupil online safety curriculum updated to reflect how the curriculum supports children to understand online safety and risk management Addition of section 13.14 Remote education. Addition of section 14 Alternative provision Full Update of Appendices 1-4 Addition of Appendix 5

15/8/22	SF	<p>KCSIE statement Page 3 amended to include updated 2022 KCSIE statement</p> <p>Contents amended to reflect changes</p> <p>Date at Bottom of page 6 amended to KCSIE Sept 22</p> <p>Edition of LSCP changed to 7th Edition throughout</p> <p>Amended wording 'peer on peer' with 'child-on-child' throughout</p> <p>1.2.5 bullet point added to include Low-level concerns</p> <p>1.2.13 wording amended to include when responding to complaints</p> <p>Sections 1.3.7 and 1.3.8 added to include children may not be ready or know how to tell someone they are being abused</p> <p>1.4.1 bullet added to show how training will assist board members</p> <p>1.4.1 bullet added clarification regarding human rights act 1998</p> <p>1.4.3 wording amended to clarify transfer of student child protection files in 5 days</p> <p>1.4.4 bullets added to clarify staff monitoring and reviewing their own practice and self referral</p> <p>1.9.1 wording amended to include the local authority threshold document for early help</p> <p>1.13.1 wording amended in bullet and two further bullets added to include low-level concerns (allegations against staff)</p> <p>13.4.1 bullet point D added</p> <p>13.4.2 bullet added to include keeping staff, parents and carers informed about harmful online challenges and hoaxes (link added)</p> <p>Annex 2 – section 1 what is abuse: amendment to introduction to update to latest KCSIE 22 definition</p> <p>Annex 2 1.1.2 addition of domestic abuse can also include teenage relationship abuse</p> <p>Annex 2 – 1.2 added information ensuring children who may be LGBT have trusted adult who they can be open with.</p> <p>Annex 2 – 2.3 addition of bullet for early intervention in regards to children missing education</p> <p>Annex 2 – 2.4.3 updated CE / CCE description to latest KCSIE 22 definition</p> <p>Annex 2 – 2.6 added link to CSE toolkit</p> <p>Annex 2 2.9 added bullet on Domestic Abuse effects and amended wording to include teenage relationship abuse</p> <p>Annex 2 – 2.18.9 amended wording to latest KCSIE 22 definitions for sexual violence and sexual harassment and included Sexual offences definitions under the Sexual Offences Act 2003</p> <p>Annex 2 addition of 2.18.10 Harmful sexual behaviour section</p> <p>Annex 2 – 2.19.1 addition of bullets to include sexual violence / sexual harassment and Intra familial harms</p> <p>Annex 2 – addition of sections 2.19.8 and 2.19.9 non criminalisation of young people and preventing abuse</p>
13/8/2023	SF	<p>DFE Statutory Guidance amended reference to KCSIE Sept 23</p> <p>Addition of 1.2.5 (K) Children Absent from education, particularly on repeat / prolonged occasions</p> <p>Addition of 1.3.3 (D & E) Staff induction including absence of children for repeat or prolonged occasions and Online safety including filtering and monitoring</p> <p>Addition of 1.4.3 (K) DSL to take lead on Online safety including filtering and monitoring</p> <p>Addition of 1.7 (F) staff training on online safety including filtering and monitoring and roles and responsibilities</p> <p>Addition of 2.3.3 € short listing and references of staff may include online searches and checks of social media</p> <p>Addition of section 3.4 Supply Staff checks</p> <p>Online Safety – Addition of 13.4 (B & E) referencing filtering and monitoring</p> <p>Annex 1 and 2 swapped in order.</p> <p>Annex 1 Section 2.3 amended wording from Children missing in education to children absent from education</p> <p>Annex 1 Section 2.3.2 amended to include children absent for prolonged periods or repeat occasions</p> <p>and the addition of 2.3.6 where school absence indicates a safeguarding concern</p> <p>Annex 1 2.13 wording changed to 'So-called' honour based abuse</p> <p>Annex 1 2.16 Prevent (2.16.4) amended to include young people who are susceptible to extremist views</p> <p>Annex 1 2.17channel – updates to include young people who are susceptible / at risk and including the text that individuals will be required to provide consent to the program</p> <p>Annex 1 2.21 Harmful Sexual Behaviour completely re-written.</p> <p>Annex 1 2.23 Updates to ongoing response to harmful sexual behaviour</p> <p>Annex 5 addition of flowchart – process for safeguarding decisions.</p> <p>Annex 6 and 7 renumbered due to insertion of earlier annex.</p>

Keeping Children Safe in Education – (KCSIE), 2023 states that:

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

It also emphasises that the voice of the child must be heard:

'Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.'

Contents

1. Safeguarding Students and vulnerable adults

- 1.1. Aims
- 1.2. Policy
- 1.3. Procedure
- 1.4. Responsibilities
- 1.5. Additional Safeguarding Responsibilities
- 1.6. Confidentiality
- 1.7. Training
- 1.8. Supporting Children
- 1.9. Early Help
- 1.10. Private Fostering
- 1.11. Managing Child Protection Cases
- 1.12. Bullying
- 1.13. Allegations Against Staff
- 1.14. Whistle blowing
- 1.15. Information Sharing

2. Safer Recruitment

- 2.1 Aims
- 2.2 Policy
- 2.3 Procedure
- 2.4 Responsibilities

3. DBS Disclosure Checks

- 3.1 Aims
- 3.2 Policy
- 3.3 Responsibilities
- 3.4 Security of Information

4. Restraint of Students and vulnerable adults

- 4.1 Aims
- 4.2 Policy
- 4.3 Procedure
- 4.4 Deciding when to use Force
- 4.5 Post Incident Support
- 4.6 Corporal punishment

5. Supervision of Students and vulnerable adults

- 5.1 Aims
- 5.2 Policy
- 5.3 Responsibilities
- 5.4 Supervision of Breaks

6. Student gone missing on or off site

- 6.1 Aims
- 6.2 Policy
- 6.3 Procedure
- 6.4 Responsibilities
- 6.5 Reducing the Risk of a Missing Student

7. Vulnerable Students and vulnerable adults

- 7.1 Aims
- 7.2 Policy
- 7.3 Responsibilities

8. Critical Incident

- 8.1 Introduction
- 8.2 Lockdown
- 8.3 Partial lockdown
- 8.4 Full lockdown
- 8.5 Evacuation
- 8.6 Bomb threat
- 8.7 Deciding to evacuate
- 8.8 Police attendance and searching buildings
- 8.9 Post – incident investigation

9. Security

- 9.1 Aims
- 9.2 Policy
- 9.3 Procedure
- 9.4 Responsibilities
- 9.5 Assessments

10. Visitors and Contractors

- 10.1 Aims
- 10.2 Policy
- 10.3 Responsibilities

11. Student/Client Illness

- 11.1 Aims
- 11.2 Policy
- 11.3 Responsibilities

12. Administering Medicines

- 12.1 Aims
- 12.2 Policy
- 12.3 Responsibilities
- 12.4 Administration of Prescribed Medicines
- 12.5 Medication Records
- 12.6 Security
- 12.7 Educational Visits
- 12.8 Sporting Activities

13. Online Safety Policy

- 13.1 Introduction and Overview
- 13.2 The main areas of risk
- 13.3 Scope
- 13.4 Roles and responsibilities
- 13.5 Communication
- 13.6 Handling Incidents
- 13.7 Education and Curriculum
- 13.8 Staff training
- 13.9 Parent awareness
- 13.10 Expected conduct and Incident management
- 13.11 Incident Management
- 13.12 CCTV
- 13.13 Digital images and video
- 13.14 Remote Education

14. Supervisory arrangements for the management of children in Alternative Provision and in out of school hours' activities

Annexes

1. Abuse
 1. What is abuse?
 2. Specific forms of abuse
 - 2.1. Child abduction and community safety incidents
 - 2.2. Children and the court system
 - 2.3. Children who are absent from education
 - 2.4. Children with family members in prison
 - 2.5. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines
 - 2.6. Child Sexual Exploitation
 - 2.7. Child Criminal Exploitation and County Lines
 - 2.8. Modern slavery and the National Referral Mechanism
 - 2.9. Cybercrime
 - 2.10. Domestic abuse
 - 2.11. Serious Violence
 - 2.12. Homelessness
 - 2.13. So-called Honour based abuse
 - 2.14. Female Genital Mutilation (FGM)
 - 2.15. Forced marriage
 - 2.16. Prevent, radicalisation and extremism
 - 2.17. Channel
 - 2.18. Sharing nudes and semi nudes (formerly sexting)
 - 2.19. Child-on-child abuse
 - 2.20. Recognising peer abuse
 - 2.21. Harmful Sexual Behaviour (HSB)
 - 2.22. Unsubstantiated, unfounded, false or malicious reports
 - 2.23. Ongoing response – support for victims and perpetrators
 - 2.24. Online bullying
 - 2.25. Upskirting
 - 2.26. Substance abuse
 - 2.27. Mental health
 - 2.28. Children requiring mental health support
2. Dealing with disclosure
3. Disclosure record form
4. Dealing with a safeguarding concern
5. Safeguarding flow chart
 - a. Part 1: disclosure or concern
 - b. Part 2: scanning and attaching documents
 - c. Part 3: after a concern has been raised
6. Online Safety Infringements and Sanctions
7. Parent Information – Remote working

DfE Statutory Guidance

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

- Keeping Children Safe In Education - Sept 23
- Working Together to Safeguard Children – July 2018 (with Dec 2020 Update)
- London Safeguarding Children Procedures 7th edition
- DfE Teaching Online Safety 2019

Other school policies including:

- School online safety policy
- Schools Staff Code of Conduct
- Staff Acceptable Use Agreement
- Information Security Policy (including Filtering and Monitoring)

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. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. Ultimately, all systems, processes and policies in our school operate with the best interests of the child at their heart. This policy should also be read in conjunction with other policies listed above.

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

- a.** Protecting children from maltreatment
- b.** Preventing impairment of children's mental and physical health or development
- c.** Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- d.** 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

1.2. Aims

- 1.2.1. To have in place procedures to ensure that we meet our responsibilities for safeguarding Students and vulnerable adults from abuse.
- 1.2.2. To have in place procedures to ensure that staff are protected against allegations of abuse.
- 1.2.3. To support the child's or vulnerable adult's development in ways that will foster security, confidence and independence.

1.3. Policy

- 1.3.1. 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.
- 1.3.2. 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.
- 1.3.3. 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.

- 1.3.4. 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.
- 1.3.5. 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:
- a.** Provide a systematic means of monitoring children known or thought to be at risk of harm.
 - b.** Support pupils who have suffered abuse in accordance with their agreed Child Protection Plan.
 - c.** Emphasise the need for good levels of communication between all members of staff and inter-agency working.
 - d.** 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.
 - e.** Set out a structured procedure within the BEP Group community in cases of suspected abuse.
 - f.** Share information about child protection and good practice with children, parents and carers, staff and volunteers.
 - g.** 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.
 - h.** Ensure all staff are aware of the BEP Group's code of conduct which includes low-level concerns, allegations against staff and whistleblowing.
 - i.** Ensure all staff have signed the AUP - acceptable use policy
 - j.** Provide effective management for staff and volunteers through support, supervision and training.
 - k.** An appropriate safeguarding response to children who are absent from education, particularly on repeat occasions and or prolonged periods
- 1.3.6. We have in place procedures to ensure that we meet our responsibilities for safeguarding Students and vulnerable adults from abuse.
- 1.3.7. We have in place procedures to ensure that all staff are protected against allegations of abuse.
- 1.3.8. This policy and procedures should be read in conjunction with policies listed above.
- 1.3.9. This policy and the following procedures apply to all paid staff, volunteers and governors working with or in BEP Group

1.4. Procedure

- 1.4.1. 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:
 - a. Physical Abuse
 - b. Emotional Abuse
 - c. Sexual Abuse
 - d. Neglect
- 1.4.2. Appendix 2 also lists further types of abuse.
- 1.4.3. All new members of staff, supply staff and volunteers, as part of the induction process, will be made aware of the following:
 - a. Safeguarding and Child Protection Policy, which includes child-on-child abuse,
 - b. Staff code of conduct and acceptable use policy
 - c. Behaviour policy, which includes measures to prevent bullying, including cyber bullying, prejudice based and discriminatory bullying
 - d. Safeguarding response to children who are absent from education, particularly on repeat occasions and or prolonged periods
 - e. Receive appropriate safeguarding and child protection training (including online safety) which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- 1.4.4. All members of staff will read the latest version of Keeping Children Safe in Education part 1. Senior Leadership will support all staff in understanding this key document and implementing it in their practice.
- 1.4.5. All staff will be expected to know how to access the latest edition of the London Child Protection Procedures at <http://www.londoncp.co.uk/>.
- 1.4.6. All concerns must be reported to the Safeguarding team and discussed immediately. A DSL will decide the appropriate action in consultation with the SMT.
- 1.4.7. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and / or they may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- 1.4.8. It is important that staff determine how best to build a trusted relationship with children and young people which helps to facilitate communication.
- 1.4.9. The conduct of staff when in a 1:1 situation with a child should be managed in a way that would not lead any reasonable person to question their motives or intentions.

- 1.4.10. All staff must ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to children.
- 1.4.11. All staff must be aware of the school's 'Whistleblowing and Managing Allegations Policy' and how to access it.
- 1.4.12. In the event that there are concerns about a child the Designated Safeguarding Lead will consult with the appropriate department of the Local Authority to inform their decision-making process with regard to the presenting safeguarding concerns.
- 1.4.13. Recording information - all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing. This will also help if / when responding to any complaints about the way a case has been handled. Notes must be taken which record:
 - a. The date
 - b. Time
 - c. Place
 - d. Nature of the concern
 - e. All facts
 - f. Observed injuries and bruises
 - g. Note the actual words of the child and not your opinion
 - h. Sign the notes and hand to the Child Protection Officer
- 1.4.14. 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 the Local Authority (including Children's Social Care and Police) to discuss putting safety measures into effect.
- 1.4.15. All Parents/ carers are made aware of the possibilities of staff members actions with regard to child protection procedures except where it is deemed that the child may be put at more risk, in the case of an on-going police investigation or under the advice of the Local Authority Child Protection Team.
- 1.4.16. All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy.
- 1.4.17. Support will be provided for staff who may feel distressed from being involved with a case of abuse. These staff may be offered supervision.

1.5. **Responsibilities**

- 1.5.1. The Board (Proprietor), via the Chief Executive will:
 - a. ensure that the Safeguarding policy and other related procedures are in place and up to date
 - b. appoint a senior member of staff to act as the designated child protection officer (Designated Safeguarding Lead – DSL)
 - c. nominate the Chief Executive to liaise with the child protection officer
 - d. have in place safer recruitment procedures
 - e. ensure that DBS checks are undertaken for everyone working with children

- f.** undertake regular appropriate training about the ways of safeguarding children. This training should equip them with the knowledge to provide strategic challenge to test the safeguarding policies and procedures in place are effective and support a robust whole school approach to safeguarding
- g.** ensure that safeguarding and online safety is taught across the curriculum
- h.** be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including Public Sector Equality) and their local multi-agency safeguarding arrangements
- i.** review the policy annually and make appropriate amendments

1.5.2. The SMT will:

- a.** implement the policy
- b.** monitor the policy
- c.** ensure the policies and procedures adopted (particularly those concerning referrals and cases of suspected abuse and neglect), are understood, and followed by all staff
- d.** report annually to the Trustees through the Chief Executive on the effectiveness of the policy

1.5.3. The Designated Safeguarding Lead (DSL)/Child Protection Officer will:

- a.** investigate and deal with all cases of suspected or actual problems associated with child protection
- b.** keep up to date with all new guidance on safeguarding children
- c.** keep all personnel up to date with any changes to procedures
- d.** organise appropriate training for personnel
- e.** ensure that all staff have awareness of and access to the latest copy of the London Child Protection procedures, Part A
- f.** liaise with the SMT
- g.** annually review the policy with the SMT
- h.** ensure that full and accurate chronological records are kept confidentially and are separate from the student records.
- i.** ensure that an indication of further record-keeping is marked on student records
- j.** be aware of the designated contact and procedure for child protection in each local area of operation
- k.** take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) issues that children in need are experiencing, or have experienced, and identifying the impact these issues might be having on children's attendance, engagement and achievement at school
- l.** liaise with the Local Authority the mental health support team, where safeguarding concerns are linked to mental health.
- m.** ensure that any child who is subject to a child protection plan who is absent without explanation is referred to Social Care.
- n.** ensure that where any child currently who is subject to a Child Protection Plan leaves, relevant information is transferred to the new provision within 5 days or in the first 5 days of a new term by secure transit and that the child's social worker is informed.
- o.** The DSL/CPO is **Jo Green** and the deputies are **Debbie Jennings, Debbie Gowers** and **Debbie Angel**.

1.5.4. Staff must be:

- a. aware of this policy and procedures
- b. aware of the names of the designated CP Officers
- c. trained in identifying signs of harm and abuse
- d. know how to report any suspected case of harm or abuse
- e. kept up to date with changes in procedures
- f. prepared to attend a Strategy Meeting
- g. prepared to attend a Child Protection Case Conference
- h. aim to continually monitor and review their practice and ensure they follow the guidance contained in this document.
- i. self-report if their conduct or behaviour falls short of these guiding principles

1.6. **Additional Safeguarding Responsibilities:**

1.6.1. Keeping in touch with children including children not in school

- a. Contact details for parents and carers, and additional emergency contact numbers should be kept up to date. There is a recognition that there may be changes in detail about family circumstances over this time. The school will do everything possible to update contact and welfare information for children and their families.
- b. If children are at home, first day calling will be in place and children working at home should have reporting routes for raising concerns, including worries about being online.
- c. The school will have regular contact arrangements with families and children when they are learning at home.

1.6.2. Reporting concerns about children (face to face or via phone, video or similar)

- a. All staff, in school or working from home, must understand how to raise a concern. This should be immediate - reporting to the DSL / Safeguarding Team using existing school processes.
- b. Talk to a DSL/Team member
- c. Follow up by completing a 'cause for concern' using the database

1.6.3. Learning online

- a. The school will continue to provide learning opportunities. This will be a blend of activities to undertake at home, online activities and live virtual opportunities.
- b. There will be protocols for participation, for school staff and for the children at home. School staff should be aware that if they observe anything or concern, or if a disclosure is made in a virtual environment, the usual procedures apply and the concern will be taken straight to the DSL.

1.7. Confidentiality

- 1.7.1. Confidentiality is a very difficult issue but all personnel have a professional responsibility to share information with other professionals who are investigating a case.
- 1.7.2. 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 and will only be shared with people that need to know, who will decide what to do next.
- 1.7.3. All child protection records are regarded as confidential and will be kept in a secure place.
- 1.7.4. 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.
- 1.7.5. Parents will be informed of our actions except where it is deemed that the child may be put at more risk, in the case of an on-going police investigation or under the advice of the Local Authority Child Protection Team.
- 1.7.6. The Child Protection Officer will attend all Child Protection Case Conferences if appropriate.
- 1.7.7. 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

1.8. Training

- 1.8.1. Whilst not exhaustive, we have identified the following staff training needs:
 - a. Child Protection Course as part of induction to the organisation
 - b. CPD for Designated Safeguarding Lead(s)/Child Protection Officers including DSL update training (now every two years, from 2021)
 - c. Positive handling, safe intervention and de-escalation
 - d. Safer recruitment training for staff involved in the recruitment process
 - e. All staff will receive Keeping Children Safe in Education (KCSIE) update training every year.
 - f. All staff safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)

1.9. Supporting Children

- 1.9.1. 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.

- 1.9.2. 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.
- 1.9.3. 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.
- 1.9.4. Some children's circumstances mean they are more vulnerable to abuse and/or less able to easily access services. These children often require a high degree of awareness and co-operation between professionals in different agencies, both in recognising and identifying their needs and in acting to meet those needs.
- 1.9.5. Our organisation will support all pupils by:
 - a. Encouraging self-esteem and self-assertiveness whilst not condoning aggression or bullying.
 - b. Promoting a caring, safe and positive environment within the organisation.
 - c. 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)
 - d. Liaising and working together with all other support services and those agencies involved in the safeguarding of children
 - e. Notifying Social Care as soon as there is a significant concern.
 - f. 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.
- 1.9.6. 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 (See section 14).

1.10. Early Help

- 1.10.1. At BEP Academy we also liaise with a wide variety of outside agencies, many of which are able to see students weekly. We undertake to take part in discussions to agree the level of assessment and support to be commissioned and delivered according to the local threshold document.
- 1.10.2. Examples of the wider agencies we liaise with include; multi-agency team/s, Child and Adolescent Mental Health Services (CAMHS), our local Police Community Support Officers (PCSO's), the Police, Local Authority MASH, Integrated Care Systems and other services.
- 1.10.3. We encourage families, students and parents to work with these partner agencies also. The provision of early help services should form part of a continuum of help and support to respond to the different levels of need of individual children and families.
- 1.10.4. Children who may require early help

Staff and volunteers working within BEP Academy should be alert to the potential need for early help for children. Staff and volunteers

should consider following the procedures identified for initiating early help for a child who:

- a.** is disabled and has specific additional needs
- b.** has special educational needs
- c.** is a young carer
- d.** is showing signs of engaging in anti-social or criminal behaviour
- e.** is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- f.** has returned home to their family from care; and/or
- g.** is showing early signs of abuse and/or neglect.

- 1.10.5. All initial contacts where staff or volunteers wish to make a request for general advice, information or a service for a child who may be a child with additional or complex needs should be made by contacting the Designated Safeguarding Lead who will make a referral to the Local Authority where appropriate, using the Common Assessment Framework (CAF).

1.11. Private Fostering

- 1.11.1. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.
- 1.11.2. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
- 1.11.3. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.
- 1.11.4. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.
- 1.11.5. We have a mandatory duty to report to the local authority where we are aware or suspect that a child is subject to a private fostering arrangement. Although BEP academy has a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the academy. However, it should be clear to the academy who has parental responsibility.
- 1.11.6. BEP Academy staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The academy itself has a duty to inform the local authority of the private fostering arrangements.
- 1.11.7. On admission to BEP Academy, we will take steps to verify the relationship of the adults to the child who is being registered.

1.12. **Managing Child Protection Cases**

- 1.12.1. Children potentially at greater risk of harm (Tier 3 - Child in Need and Tier 4 - Child Protection) may need a social worker due to safeguarding or welfare needs.
- 1.12.2. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- 1.12.3. Where children need a social worker, this will inform decisions about safeguarding (e.g. responding to unauthorised absence or missing education where there are known safeguarding risks) and promoting welfare (e.g. considering the provision of pastoral and/or academic support, alongside action by statutory services).
- 1.12.4. We will establish with the social care team any additional reporting requirements.
 - a. Management of children subject to Child Protection investigation or subject to a Child Protection Plan
 - b. The Designated Safeguarding Lead and team will contribute to the child protection investigation and attend or contribute to the Strategy meetings.
 - c. The Designated Safeguarding Lead or deputy will attend the Initial Child Protection Conference to share any relevant information and provide a written report for the conference.
 - d. If the child is placed on the Child Protection Plan, the Designated Safeguarding Lead or deputy is responsible for ensuring that the school participates appropriately in the Child Protection Plan and attends all Core Group Meetings and Child Protection Conferences.
 - e. Information will be shared with staff on a "need to know" basis but key personnel working with child should have sufficient information to support them in their work with that child.
 - f. If a child with a Child Protection Plan has an unexplained absence from school, the Designated Safeguarding Lead will inform the Social Worker.

1.13. **Bullying**

- 1.13.1. 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.
- 1.13.2. Bullying and abuse can be motivated by perceived differences e.g. on the grounds of race, religion, gender, sexual orientation, disability or other difference. We acknowledge that repeated incidents or a single serious incident may lead to consideration under child protection procedures.

1.14. Allegations against staff

- 1.14.1. We understand that a child may make an allegation against a member of staff.
- 1.14.2. If such an allegation is made (no matter how small), the member of staff receiving the allegation or having the concern will immediately inform their senior member of staff.
- 1.14.3. On all such occasions the Child Protection officer will discuss the content of the allegation with Local Authority Designated Officer (LADO).
- 1.14.4. Where a low-level concern is shared the Principal will be the ultimate decision maker and if there is any doubt as whether the information shared reaches the harm threshold will consult with the Local Authority Designated Officer (LADO).
- 1.14.5. Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.
- 1.14.6. 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).
- 1.14.7. As an organisation we follow the London Child Protection Procedures for dealing with allegations against staff.

1.15. Whistle blowing

- 1.15.1. We recognise that children cannot be expected to raise concerns in an environment where staff fails to do so.
- 1.15.2. All staff are made aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.
- 1.15.3. Further information is available in our separate policy on whistle blowing, which can be provided on request.

1.16. Information Sharing

- 1.16.1. BEP Group follows the DfE "Information Sharing – advice for practitioners providing safeguarding services to children, young people, parent and carers" guidance and procedures.
- 1.16.2. 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.
- 1.16.3. 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. 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, identify 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.
- 2.2.4. The school will follow the guidance set out in:
 - a. Keeping Children Safe in Education (latest addition)
 - b. Local Safeguarding Partnership procedures
 - c. London Child Protection Procedures 7th edition.

2.3. Safer Recruitment Procedure

When a post becomes vacant or is created then the following procedure takes place:

2.3.1. Job advertisement

- a. All posts will be advertised internally and externally (including agencies) in order to attract as wide a field of candidates as possible.
- b. 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.

2.3.2. Job Information Pack

- a. All agency applicants will be asked to supply a CV
- b. 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.

2.3.3. Short-Listing and References

- a.** Applicants will be short-listed for the post if they suit the job description and person specification.
- b.** Immediately after short-listing, references will be requested for those candidates short-listed.
- c.** 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.
- d.** All references will be checked for consistent information.
- e.** Carry out an online search as part of due diligence (applicants will be informed that these online checks will take place)
- f.** The candidate will be asked to clarify any highlighted discrepancies.

2.3.4. The Interview

- a.** All candidates will be asked to bring identity proof with them as required for a DBS Check
- b.** All applicants will undergo a face-to-face interview where questions pertaining to child protection will be asked.
- c.** 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.
- d.** 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.

2.3.5. Pre - Employment Checks for the Successful Candidate

Before taking up the post the following checks will be undertaken on the successful candidate (copies of documents used to verify are kept on their personnel file):

- a.** References (minimum of 2, one of which should be recent employer)
- b.** Photo proof of identity
- c.** DBS Enhance Disclosure
- d.** Prohibition from teaching and prohibition of management (where applicable)
- e.** Proof of a right to work in the UK

2.3.6. 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.

2.3.7. We will keep a single central record of recruitment and record checks of:

- a.** all staff
- b.** all volunteers
- c.** all work experience providers (where appropriate)
- d.** trustees
- e.** regular contractors

2.4. Safer Recruitment Responsibilities

2.4.1. The Board has:

- a.** the responsibility of ensuring that the safe recruitment process complies with DfE guidance and legal requirements
- b.** delegated certain powers and responsibilities to the Chief Executive to oversee compliance with DfE guidance and legal requirements
- c.** responsibility for the effective implementation, monitoring and evaluation of this policy

2.4.2. The Chief Executive Officer will:

- a.** promote the safeguarding and welfare of children
- b.** ensure the organisation operates safe recruitment procedures
- c.** ensure all appropriate pre-employment checks are completed
- d.** ensure contractors and agencies comply with this policy
- e.** ensure that relevant staff attend safer recruitment training
- f.** monitor and evaluate the effectiveness of this policy

3. DBS Disclosure Checks

3.1. 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.

3.2.2. 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.

3.2.3. 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.

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

- 3.2.5. Enhanced disclosures will be applied to the following categories:
- a.** All staff
 - b.** Volunteers at our training centre
 - c.** Work Experience Providers for placements which run over 15 days, or who are sole traders
 - d.** Contractors
 - e.** Trustees
- 3.2.6. 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:
- a.** Pupils on work experience
 - b.** Work Experience providers for placements 15 days or under
 - c.** Occasional school event volunteers
 - d.** Contractors who are on site when children are not present
- 3.2.7. In compliance with the Education (Restriction of Employment) we will ensure that no new employee will commence their appointment without the completion of a DBS check.
- 3.2.8. 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:
- a.** delegated powers and responsibilities to the Chief Executive Officer to ensure DBS disclosures are in place
 - b.** nominated the Chief Executive Officer to report back to the Board
 - c.** responsibility for the effective implementation, monitoring and evaluation of this policy
- 3.3.2. The SMT will:
- a.** implement this policy
 - b.** ensure all personnel and volunteers are aware of it
 - c.** monitor and evaluate the effectiveness of this policy
- 3.4. Supply staff
- 3.4.1. Where supply staff are used BEP Academy will obtain written notification from any agency or third party organisation that they have carried out the same checks as the school on any individual who will be working at the school or will be providing education on the schools behalf including through online delivery.
- 3.4.2. Where the agency or organisation has obtained enhanced DBS certificate before a person is due to begin work, which has disclosed any matter of information, the school must obtain a copy of the certificate from the agency.

3.5. Security of Information

- 3.5.1. 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.
- 3.5.2. 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. 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. 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:
 - a. committing any offence (or, for a student under the age of criminal responsibility, what would be an offence for an older student)
 - b. causing personal injury to, or damage to the property of, any person (including the student him/herself); or
 - c. 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.
- 4.2.3. To be judged lawful, the force used would need to be in proportion to the consequences it is intended to prevent.
- 4.2.4. 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. A calm, orderly and supportive school climate.
 - b. Strong and effective relationships between Students and vulnerable adults and staff.
 - c. An effective staff development programme that develops the skills of positive behaviour management.
 - d. Identifying when an incident is going to happen.
 - e. Using effective strategies to manage all incidents that occur.

- f.** Informing a disruptive student that force may be used before using it.
- g.** Ensuring that no student is locked in a room as part of managing behaviour.

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:

- a.** Assessing the seriousness of the incident that if force is not used then it could result in injury, damage or disorder.
- b.** After considering alternatives for dealing with the situation, force is the only justifiable way of achieving a positive result.
- c.** 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:

- a. Fighting** - Students and vulnerable adults fighting.
- b. Attack** - a student attacks an adult or another student.
- c. Damage to property** – a student deliberately damages property or is about to.
- d. Injury or damage** – a student causes or is about to cause injury or damage.
- e. 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.
- f. Defying an instruction** – when a student persistently refuses to leave a classroom.
- g. Disruption of lessons** – when a student's behaviour seriously disrupts a lesson.
- h. 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:

- a.** act in a calm and measured manner.
- b.** show no anger or frustration.
- c.** 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:
 - a. **passive physical contact** by standing between Students and vulnerable adults or by blocking a student's path
 - b. **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 individual Students and vulnerable adults
- 4.4.9. Staff will be trained in the techniques of restraint when they join the company, and this training will be repeated at least every three years.
- 4.4.10. Records will be kept of all incidents and parents will be informed by telephone and then by letter.

4.5. Post-incident support

- 4.5.1. After an incident has occurred the following procedure will take place:
 - a. First aid if necessary
 - b. Medical help if necessary
 - c. Emotional support to student/vulnerable adult
 - d. Emotional support to staff
 - e. Recording of the incident on the database.
 - f. Discussions with parents
- 4.5.2. All complaints and allegations will be dealt with by using the procedures as stated in the Complaints Policy.

4.6. Corporal punishment

- 4.6.1. The use of corporal punishment in schools will ordinarily result in a criminal offence being committed. Corporal punishment, or the threat of corporal punishment, is not allowed in our school.

5. Supervision of Students and vulnerable adults

- 5.1. 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. 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.

5.2.4. 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. Responsibilities

5.3.1. The Board has:

- a.** a legal duty of care for all pupils and to provide adequate supervision of Students and vulnerable adults throughout the school day
- b.** 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
- c.** responsibility for the effective implementation, monitoring and evaluation of this policy

5.3.2. The Chief Executive will:

- a.** be responsible for the internal organisation, management and control of the school
- b.** 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
- c.** ensure all school staff are aware and comply with this policy
- d.** ensure that all school staff are aware of their supervisory roles and responsibilities with Students and vulnerable adults during the school day
- e.** organise appropriate training for school staff
- f.** monitor the effectiveness of this policy
- g.** annually report to the Board.

5.3.3. Staff will:

- a.** be aware of and comply with this policy
- b.** 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
- c.** ensure that no class of Students and vulnerable adults should be left unsupervised
- d.** ensure they take the necessary precautions before undertaking any one-to-one supervision
- e.** record and report any incident or accident that could be considered a breach of supervision

5.3.4. Parents are asked to ensure that:

- a.** their children arrive at school at least 10 minutes before school starts
- b.** 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:

- a.** be on duty 15 minutes prior to school begins
- b.** 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:

- a.** ensure duty rotas are in place so that there is adequate supervision
- b.** ensure procedures and duties are clearly understood by all involved with student supervision
- c.** ensure duty tutors begin supervision promptly
- d.** act as line manager at break times when tutors and support staff are on duty
- e.** ensure good lines of communication are in place to ensure the overall safety of the students and vulnerable adults at these times
- f.** ensure procedures for dealing with accidents are in place
- g.** ensure all accidents are recorded in the appropriate accident book
- h.** ensure parents are notified of any accident, especially head injuries
- i.** ensure school staff are trained in emergency first aid
- j.** ensure permission is obtained from parents for Students and vulnerable adults leaving during lunch breaks

5.4.3. Supervision during off-site visits

- a.** 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. 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. 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. Procedure

- 6.3.1. In the event that a student has gone missing in the centre:
 - a.** Inform the SMT
 - b.** Search the premises
 - c.** Check the CCTV footage
 - d.** Search the immediate area surrounding the school
 - e.** Contact the student's or vulnerable adult's parents /carers
 - f.** If the student is still not found, then contact the police giving full details of the child / vulnerable adult
 - g.** Inform the school/LA
 - h.** When the student / vulnerable adult is found, review security procedures
- 6.3.2. When the student / vulnerable adult is found security procedures will be fully reviewed
- 6.3.3. All appropriate personnel must be trained in how to deal with a student / vulnerable adult going missing
- 6.4. Responsibilities
 - 6.4.1. The Board has:
 - a.** appointed a manager to put into practice security measures
 - b.** delegated powers and responsibilities to the Chief Executive to oversee all security measures
 - c.** responsibility for the effective implementation, monitoring and evaluation of this policy
 - 6.4.2. The SMT will:
 - a.** ensure that security measures are in place and are effective
 - b.** ensure that all staff are aware of security procedures and the roles of staff
 - c.** notify parents of security procedures and the procedures for dealing with a missing student
 - d.** monitor and evaluate the effectiveness of this policy
 - e.** monitor security procedures
 - f.** undertake/coordinate security risk assessments
 - g.** consider all suggested ideas from school staff, parents, Students and vulnerable adults and visitors for improvement
 - h.** inform parents of new and improved security measures
 - 6.4.3. All staff will:
 - a.** be aware of and abide by this policy
 - b.** undertake appropriate training in security procedures
 - c.** inform and remind Students and vulnerable adults of security procedures such as the reporting of unidentified visitors
 - d.** 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:
 - a.** ensure they provide correct and updated contact details

- b.** be aware of security procedures especially at the beginning and end of the day

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:

- a.** entrances and exits are secure
- b.** windows are secure
- c.** challenging and dealing with unauthorised people on the school sites
- d.** outside lighting is switched on
- e.** security of valuables and personal possessions
- f.** visitors and contractors wearing identification badges
- g.** staff carrying radios

7. Vulnerable Students and vulnerable adults

7.1. 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. 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:
 - a.** Looked After Children (LAC)
 - b.** Bullied/cyber bullied
 - c.** Students and vulnerable adults who go missing from home/school
 - d.** Suffering from neglect, physical abuse, sexual abuse or emotional abuse
 - e.** Suffering from bereavement
 - f.** Refugees/asylum seekers
 - g.** Experiencing drugs or alcohol abuse
 - h.** Students and vulnerable adults with a disability
 - i.** 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:
 - a. appointed a member of staff to be the Coordinator for Safeguarding Children
 - b. nominated the Chief Executive Officer to visit the centres regularly and to liaise with the DSL; report back to the board; be familiar with local Area Safeguarding Committee procedures and LEA procedures
 - 7.3.2. The Chief Executive will:
 - a. ensure the implementation of this policy
 - b. ensure that the recruitment policy is safe and effective
 - c. ensure that all school personnel and volunteers have undertaken DBS checks
 - d. monitor the effectiveness of this policy
 - 7.3.3. The DSL will:
 - a. be fully conversant in safeguarding procedures
 - b. ensure all personnel are aware of their responsibilities
 - c. ensure that all personnel are aware of the system of reporting suspected child abuse
 - d. report cases of suspected child abuse to social services
 - e. liaise with social services and other agencies
 - f. organise in-house training for personnel
 - g. attend training in order to keep up to date with new developments and resources
 - h. ensure all relevant and current documentation is up to date
 - i. review and monitor the effectiveness of this policy

8. Critical Incident (Lockdown, Evacuation and Bomb threat)

8.1. Introduction

A 'Critical Incident' can be defined as:

- 8.1.1. An event or sequence of events affecting pupils and/or teachers which creates significant personal distress to a level which potentially

overwhelms normal responses, procedures and coping strategies and which is likely to have serious emotional and organisational consequences.

- 8.1.2. Regrettably, in recent times a number of very serious incidents have occurred in British schools which, in the worst cases, have resulted in death and serious injury both to pupils and teachers.
- 8.1.3. In other incidents, while no casualties resulted, pupils and teachers have been severely traumatised as a consequence of the random actions of individuals causing disruption on school premises. There have also been a number of 'natural' disasters, which have caused intense distress and sadness to staff, pupils and families, and which have interrupted the normal functioning of the school.
- 8.1.4. There are also more common occurrences, such as the death of a pupil from a terminal illness or traffic accident, which can have profound effects on individuals, groups and sometimes the school as a whole.
- 8.1.5. This document sets out the procedures for dealing with the need to lockdown or evacuate the premises.

8.2. Lockdown – Two stages of lockdown – partial and full

- 8.2.1. Partial lockdown (SECURE) – examples
 - a. Civil disturbance in the local community
 - b. A suspicious person spotted around the site
 - c. A dangerous dog roaming loose
 - d. Local risk of air pollution
- 8.2.2. Full lockdown (LOCKDOWN) – examples
 - a. Immediate threat of danger
 - b. A suspicious intruder
 - c. An armed intruder
 - d. Any other reasons as specified by emergency services

8.3. Procedure for Partial Lockdown

- 8.3.1. This is where there is not an immediate threat inside school.
- 8.3.2. A verbal message will be given using the supplied radios:

“Secure, secure, secure”
- 8.3.3. Children outside will come into their class’s building immediately. Should you be concerned that you are unable to move a class into school quickly enough, in Romford you can go to one of the cabins, however, you must radio your location as soon as possible.
- 8.3.4. Close the windows and draw the blinds where fitted.
- 8.3.5. Movement around the main school is permitted but no one is allowed outside the building. It is best to keep children in the classroom, e.g. do not send groups out to work, until the reason for the partial lockdown is known.

- 8.3.6. We would take advice from emergency services if it related to a local issue to make an ongoing dynamic risk assessment.

8.4. Procedure for Full Lockdown

- 8.4.1. This is where there is an immediate threat inside the school grounds.

- 8.4.2. A verbal message will be given using the supplied radios:

"Lockdown, Lockdown, Lockdown"

- 8.4.3. All children return to their classrooms or go to the nearest building / classroom immediately.
- 8.4.4. All external doors will remain locked.
- 8.4.5. All internal doors need to be closed.
- 8.4.6. Windows must be shut, and blinds drawn.
- 8.4.7. Children and adults go under desks or out of view as soon as possible.
- 8.4.8. Staff to ensure their radio is working and tuned to the correct channel to allow emergency communication.
- 8.4.9. Staff not with a class must remain where they are and secure the room they are in.
- 8.4.10. A class in the garden (e.g. PE) must go inside immediately and follow instructions as above.
- 8.4.11. Once you are inside and safely secured, the school manager or duty manager must call (or arrange for a colleague to call) the police on 999.

8.5. Evacuation

- 8.5.1. Before or after school

- a.** These procedures are to be followed if the decision has been made to evacuate before or after school.
- b.** The duty or school manager to activate the fire alarm and call police 999.
- c.** Text messages must be sent to staff and parents to inform them.

Before school:

SMS "School is closed today because of an emergency incident. Please await further information."

After School:

SMS "School has been closed because of an emergency incident. Please await further information." Or provide information of where children can be collected.

- d.** Staff will exit the building and congregate at the muster point. Staff on route to school will meet staff at the car park.
- e.** A sign will be placed on the entrances

8.5.2. During school day

- a.** The duty or Head of School to activate the fire alarm and call police 999.
- b.** All fire wardens collect red board and follow instructions, including printing register lists.
- c.** Classes follow evacuation procedures – displayed in room
- d.** Staff without a class will exit immediately and support classes as needed on route.
- e.** Any children not with their class will be told to go out of the nearest exit and join on with any classes exiting at point.
- f.** Staff to remain calm and communicate with staff and children as they exit.
- g.** Medical/Inhaler/Epipen bags to be taken

8.6. Bomb threat

8.6.1. Being vigilant

Planning & Perpetration prior to a threat - all staff must be vigilant and must report anything unusual or suspicious.

8.6.2. Person receiving a bomb threat

- a.** The person receiving the call will allow the caller to finish the message without interruption.
- b.** If the call is received via the switchboard, or a phone that shows the telephone number on an LCD screen, try to make a note of the number before the caller rings off.
- c.** Notify the Headteacher or designated senior decision maker

8.6.3. Contacting Police

- a.** The Head teacher / designated senior decision maker along with the person receiving the bomb threat will call '999'

8.6.4. The following additional information will also be provided:

- a.** A mobile contact number so the Head teacher or designated senior decision maker can be contacted should they evacuate from the school.
- b.** The number of children and adults (including visitors) currently on site

- c.** Whether a decision has already been made to evacuate / close the school.
- d.** A Police duty officer (normally the local Duty Inspector or Duty Sergeant) will then contact the Head teacher or designated senior decision maker.
- e.** The Police officer will advise that either they believe the threat has come from a terrorist group or individual with the capability to carry out a threat (i.e. it is a credible threat) or they do not believe the threat has come from a terrorist group and there is no other intelligence or information to suggest any further risk (i.e. it is not a credible threat)
- f.** The initial police assessment will be completed as quickly as possible and will be updated as more information becomes available. It is recognised that we may decide to take action before the initial police assessment has been completed.

8.7. Deciding to Evacuate

- 8.7.1. The decision to evacuate a school is the responsibility of the Head teacher or designated senior decision maker.
- 8.7.2. Police will share information with the Head teacher and provide advice to help assess the risk and determine whether evacuation (partial or full) is necessary and proportionate.
- 8.7.3. In making the assessment the Head teacher will consider the nature of the threat (Vague, Indirect, Inconsistent or implausible v specific, Feasible, Evidence of planning etc.), whether any suspect device has been located, whether there has been recent suspicious or unusual activity and the impact upon pupils (eg. inclement weather)
- 8.7.4. As a rule of thumb consideration will be given to evacuating if there is a credible threat.
- 8.7.5. Consideration will be given to not evacuating if there is no credible threat.
- 8.7.6. If the decision is made to evacuate the school then it will be conducted through word of mouth (i.e. without the use of fire alarms or radios) and staff/pupils will use the designated assembly area.
- 8.7.7. Initial check - teachers to count the children prior to evacuation, taking into account children who are under the supervision of another member of staff.
- 8.7.8. If the decision is made to close a school consideration should be given to how parents/carers will be informed to prevent emergency services switchboards becoming overwhelmed.

8.8. Police attendance and searching buildings

- 8.8.1. In the event of a credible bomb threat police will attend the school to maintain cordons and co-ordinate the emergency response. A police-led search of the school premises is likely to be undertaken.
- 8.8.2. In the event of a non-credible bomb threat police may attend to provide visible reassurance and enable face-to-face contact with the

Head Teacher. A search of the school premises by police will only be undertaken on the rare occasion it is considered necessary and proportionate.

8.9. Post-Incident investigation

- 8.9.1. Making a hoax bomb threat is a criminal offence.
- 8.9.2. Witness statements are likely to be required from (a) the member of staff who received the original call and (b) the Head Teacher / person in charge of the school the describe the impact of the disruption caused by the hoax threat.

9. Security

9.1. 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. 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:
 - a. entrances and exits are secure
 - b. windows are secure
 - c. challenging unauthorised people on the school site
 - d. combustible material must be collected
 - e. radios are switched on
 - f. outside lighting is switched on
 - g. security of valuables and personal possessions
 - h. visitors and contractors wearing identification badges
 - i. IT security and confidential information

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

9.4. Security Responsibilities

- 9.4.1. The Board has:
 - a. delegated powers and responsibilities to the Chief Executive to oversee all school security measures

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

9.4.2. The Chief Executive will:

- a.** ensure that security measures are in place and are effective
- b.** ensure that all personnel are aware of procedures
- c.** appoint new staff that are checked by the Criminal Records Bureau
- d.** monitor and evaluate the effectiveness of this policy

9.4.3. All staff will:

- a.** be aware of and abide by this policy
- b.** undertake appropriate training in security procedures
- c.** 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:

- a.** monitor security procedures
- b.** undertake/coordinate security risk assessments
- c.** consider all suggested ideas from personnel, governors, parents, pupils and visitors for improvement

9.5. Security Risk Assessments

9.5.1. The security risk assessment will cover the following:

- a.** Students and vulnerable adults and personnel inside and outside the school / centre building
- b.** entrances and exits
- c.** evacuation procedures
- d.** alarm systems
- e.** fire safety
- f.** critical incident
- g.** violence
- h.** abduction of a pupil
- i.** suspected bomb threat
- j.** theft
- k.** IT and Internet security

10. Visitors & Contractors

10.1. Aims

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

10.2. 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. 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:

- a.** ensure the health and safety of all visitors to the centre by undertaking a Risk Assessment of the premises
- b.** ensure that all contractors when working on the premises cooperate with our health and safety policies and procedures
- c.** ensure that all contractors act in a responsible and proper manner
- d.** come to an agreement regarding how the contractor can work on the school premises during the school day
- e.** issue the code of conduct to contractors when quotations or tenders are invited
- f.** gain agreement from the contractor to comply with the code as part of the condition of offer of work
- g.** highlight the code during any pre-start meeting
- h.** check to ensure that this working agreement is fulfilled
- i.** monitor and review this policy

10.3.3. Staff will:

- a.** take reasonable care of their own health and safety
- b.** take reasonable care of the health and safety of Students and vulnerable adults, visitors and contractors
- c.** be aware of the working agreement between BEP Group and any contractor undertaking work in the school

10.3.4. Visitors will:

- a.** report to the school reception upon entering the premises
- b.** confirm their status by producing verifiable documentation
- c.** enter their details in the visitors book
- d.** wear a school visitors badge
- e.** abide by the visitors code of conduct
- f.** be familiar with the procedure of evacuating the school building in the event of an emergency
- g.** sign out when leaving the school

10.3.5. Contractors will

- a.** comply with all health and safety policies and procedures when working on the school premises
- b.** act in a responsible and proper manner
- c.** 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
- d.** avoid contact with Students and vulnerable adults
- e.** never be in contact with Students and vulnerable adults without school supervision
- f.** stay within the agreed work area and access routes
- g.** obtain permission if you need to go outside the agreed work area or access routes
- h.** keep staff informed of where you are and what you are doing
- i.** not use profane or inappropriate language
- j.** not bring inappropriate printed material onto the school site
- k.** dress appropriately – shirts to be worn at all times
- l.** observe the code at all times
- m.** not take photographs whilst on site without prior consent
- n.** remember that your actions, no matter how well intentioned, could be misinterpreted

11. Student / Client Illness

11.1. Aims

- 11.1.1. To have in place procedures to deal with all Students and vulnerable adults who become ill at the school / centre.
- 11.1.2. A Covid-19 Risk Assessment is in place, available to all staff and updated when needed.

11.2. 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 wellbeing 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/carers 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/carers 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. **Responsibilities**

11.3.1. The Board has:

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

11.3.2. The Chief Executive will:

- a. protect the health and safety of Students and vulnerable adults and personnel at all times
- b. ensure procedures are in place and effectively implemented to deal with Students and vulnerable adults taken ill at the school
- c. ensure school staff and parents are aware of this policy
- d. organise first aid training for staff
- e. ensure that Students and vulnerable adults records and emergency contact numbers are kept up to date
- f. monitor the effectiveness of this policy

11.3.3. First Aid Trained Personnel will:

- a. ensure compliance with this policy
- b. receive training in first aid at their induction and will attend periodic training to renew their first aid qualification
- c. assess the condition of any student thought to be unwell, in a kind and caring manner

11.3.4. Staff will:

- a. notify the student's school or carer of any child taken ill
- b. immediately contact the student's parents/carers of their concerns about the child's health

- c.** ensure the comfort of an ill student by staying with them while awaiting the parents to arrive
- d.** seek immediate medical advice if a student is in danger
- e.** call for an ambulance if needed
- f.** arrange for the parent/carer or school representative to escort a student to hospital
- g.** 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:

- a.** be aware of this policy
- b.** comply with this policy
- c.** notify the nominated key worker of any changes to their contact details
- d.** 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
- e.** consult with their GP if their child is suffering from one of the communicable diseases
- f.** 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. Aims

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

12.2. 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. **Responsibilities**

12.3.1. The Board has:

- a.** appointed a member of staff to be the Coordinator for Health and Safety
- b.** nominated the CEO to liaise with the coordinator and to report back to the Board
- c.** a responsibility for the effective implementation, monitoring and evaluation of this policy

12.3.2. The SMT will:

- a.** ensure the administration of prescribed medicines by putting into practice effective strategies and examples of good practice
- b.** 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:

- a.** undertake appropriate training
- b.** 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:

- a.** written permission for administration of medicines
- b.** sufficient medical information on their child's medical condition
- c.** the medication in its original container
- d.** 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:

- a.** be aware of Individual Health Care Plans and of symptoms which may require emergency action
- b.** read and check parental consent before administering or supervising the taking of medicines
- c.** check that the medication belongs to the named student
- d.** check that the medication is within the expiry date
- e.** inform the parent if the medication has reached its expiry date
- f.** confirm the dosage/frequency on each occasion and consult the medicine record form to prevent double dosage
- g.** record on the medication record all relevant details of when medication was given
- h.** return medications to the secure cabinet for storage
- i.** always take appropriate hygiene precautions
- j.** record when a pupil refuses to take medication
- k.** 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:

- a.** Name and date of birth of the child
- b.** Name and contact details of the parent/carer
- c.** Name and contact details of GP
- d.** Name of medicines
- e.** Details of prescribed dosage
- f.** Date and time of last dosage given
- g.** Consent given by parent/carer for staff to administer medication
- h.** Expiry date of medication
- i.** 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

13.1. Introduction and overview

The purpose of this policy is to:

- 13.1.1. Set out the key principles expected of all members of BEP Group with respect to the use of IT-based technologies.
- 13.1.2. Safeguard and protect the children and staff.
- 13.1.3. 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.
- 13.1.4. 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.
- 13.1.5. 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.
- 13.1.6. 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.
- 13.1.7. Minimise the risk of misplaced or malicious allegations made against adults who work with students.

13.2. Main area of risk

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

13.2.1. Content

- a.** Exposure to inappropriate content
- b.** Lifestyle websites promoting harmful behaviours
- c.** Hate content
- d.** Content validation: how to check authenticity and accuracy of online content

13.2.2. Contact

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

13.2.3. Conduct

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

13.2.4. Commerce

- a.** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

13.3. Scope

- 13.3.1. 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 (Proprietor), through the Chief Executive will:

- a.** Ensure that the online safety policy and other related procedures are in place and up to date
- b.** Includes appropriate filtering and monitoring on school devices and school networks
- c.** To lead a safeguarding culture ensuring that online safety is fully integrated into safeguarding as a whole
- d.** Nominate the Chief Executive to liaise with the Safeguarding Officer
- e.** Consider the age range and number of children, those who are potentially at greater risk of harm and how often they access the IT system and the proportionality of costs verses safeguarding risks

13.4.2. The SMT will:

- a.** Implement the policy
- b.** Monitor the policy with the Safeguarding lead
- c.** Report annually on the effectiveness of the policy
- d.** To ensure Trustees are regularly updated on the nature and effectiveness of the BEP Group's arrangements for online safety
- e.** Ensure suitable 'risk assessments' are undertaken so the curriculum meets needs of pupils, including risk of children being radicalised
- f.** Ensure BEP Group uses appropriate IT systems and services
- g.** Be responsible for ensuring that all staff receive suitable training to carry out their safeguarding and online safety roles
- h.** Ensure that there is a system in place to monitor and support staff who carry out internal online safety procedures, e.g. network manager
- i.** Take overall responsibility for online safety provision
- j.** Ensure staff, parents and carers are kept up to date and given advice on preparing for any online challenges and hoaxes and how to get support following the guidance at [Harmful Online challenges and online hoaxes](#). This link is provided to parents in the student handbook and available on the school website.

13.4.3. The DSL/Child Protection Officer Will:

- a.** Be adequately trained in off-line and online safeguarding, in-line with statutory guidance and relevant Local Safeguarding Children Board (LSCB) guidance
- b.** Lead a 'safeguarding' culture, ensuring that online safety is fully integrated with whole BEP Group safeguarding.
- c.** Take lead responsibility for overseeing and acting on filtering and monitoring of systems including carrying out checks and reports
- d.** Be aware of procedures to be followed in the event of a serious online safety incident
- e.** Promote an awareness and commitment to online safety throughout the BEP Group community
- f.** 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
- g.** Ensure that online safety education is embedded within the curriculum
- h.** Liaise with BEP Group technical staff where appropriate
- i.** To communicate regularly with SMT and the designated online safety Governor/committee to discuss current issues, review incident logs and filtering/change control logs
- j.** To ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident
- k.** To ensure that online safety incidents are logged as a safeguarding incident
- l.** Facilitate training and advice for all staff
- m.** Oversee any pupil surveys / pupil feedback on online safety issues
- n.** Support BEP Group in encouraging parents and the wider community to become engaged in online safety activities
- o.** Liaise with the Local Authority and relevant agencies
- p.** Is regularly updated in online safety issues and legislation, and be aware of the potential for serious child protection concerns

13.4.4. The Vice Principal (Teaching and Learning) will:

- a.** Oversee the delivery of the online safety element of the Computing curriculum

13.4.5. The Network Manager / technician will:

- a.** report online safety related issues that come to their attention, to the Safeguarding officer
- b.** manage BEP Group's computer systems, ensuring BEP Group's password policy is strictly adhered to
- c.** ensure systems are in place for misuse detection and malicious attack (e.g. keeping virus protection up to date)
- d.** ensure access controls/encryption exist to protect personal and sensitive information held on BEP Group owned devices
- e.** ensure BEP Group's policy on web filtering is applied and updated on a regular basis
- f.** ensure 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
- g.** ensure 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
- h.** ensure appropriate backup procedures and disaster recovery plans are in place
- i.** keep up-to-date documentation of the BEP Group's online security and technical procedures
- j.** regularly review the effectiveness of appropriate monitoring and filtering systems used

13.4.6. Teaching staff will:

- a.** Embed online safety in the curriculum
- b.** Supervise and guide pupils carefully when engaged in learning activities involving online technology (including, extra-curricular and extended BEP Group activities if relevant)
- c.** 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:

- a.** Report any suspected misuse or problem to the online safety coordinator
- b.** Maintain an awareness of current online safety issues and guidance e.g. through CPD
- c.** Model safe, responsible and professional behaviours in their own use of technology
- d.** Be aware that technology is a significant component in many safeguarding and wellbeing issues.

13.5. Communication

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

- a.** Policy to be part of BEP Group induction pack for new staff
- b.** Regular updates and training on online safety for all staff

- c.** Acceptable use agreements signed by staff, volunteers, students and parents / carers as part of the induction process

13.6. Handling Incidents

- 13.6.1. BEP Group will take all reasonable precautions to ensure online safety
- 13.6.2. Staff and pupils are given information about infringements in use and possible sanctions.
- 13.6.3. The Safeguarding Lead acts as first point of contact for any incident
- 13.6.4. Any suspected online risk or infringement is reported to Safeguarding Lead that day
- 13.6.5. Any concern about staff misuse is always referred directly to the CEO, unless the concern is about the CEO in which case the complaint is referred to the Chair of Trustees and the LADO (Local Authority's Designated Officer)
- 13.6.6. Any suspected phishing and or financial scams, will be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

13.7. Education and Curriculum

- 13.7.1. BEP Group:
 - a.** 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
 - b.** Plans online use carefully to ensure that it is age-appropriate and supports the learning objectives for specific curriculum areas
 - c.** Will remind students about their responsibilities through the Student and Parent Handbook
 - d.** 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
 - e.** 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
 - f.** Ensure pupils only use BEP Group-approved systems and publish within appropriately secure / age-appropriate environments.
 - g.** DfE 'Teaching Online Safety in school' outlines how the curriculum will support children to learn about risk and responsibility.
 - h.** Online safety concerns will be taken to the DSL in the same way as any other form of harm, or risk of harm.
- 13.7.2. The school will help pupils stay safe online by helping them to recognise, through the curriculum and through support offered to them, that:
 - a.** Some online content tries to make people believe something false is true and/or mislead (misinformation and disinformation)
 - b.** Companies use techniques to persuade people to buy something
 - c.** Some games and social media companies use techniques to try to keep users online longer (persuasive/sticky design)

- d.** There are grooming risks online, such as grooming into criminal activities.

13.7.3. The school will help pupils recognise acceptable and unacceptable behaviours by:

- a.** looking at why people behave differently online, for example how anonymity (you do not know me) and invisibility (you cannot see me) affect what people do
- b.** looking at how online emotions can be intensified resulting in mob mentality
- c.** teaching techniques (relevant on and offline) to defuse or calm arguments, for example a disagreement with friends, and disengage from unwanted contact or content online
- d.** considering unacceptable online behaviours often passed off as so-called social norms or just banter. For example, negative language that can be used, and in some cases is often expected, as part of online gaming and the acceptance of misogynistic, homophobic and racist language that should never be tolerated online or offline

13.7.4. The school will help pupils identify and manage risk by:

- a.** discussing the ways in which someone may put themselves at risk online
- b.** discussing risks posed by another person's online behaviour
- c.** discussing when risk taking can be positive and negative
- d.** discussing "online reputation" and the positive and negative aspects of an online digital footprint. This could include longer-term considerations, i.e how past online behaviours could impact on their future, when applying for a place at university or a job for example
- e.** discussing the risks vs the benefits of sharing information online and how to make a judgement about when and how to share and who to share with
- f.** asking questions such as what might happen if I post something online? Who will see it? Who might they send it to?

13.8. Staff training

13.8.1. BEP Group:

- a.** Makes regular training available to staff on online safety issues
- b.** 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

13.9.1. BEP Group:

- a.** Provides induction for parents which includes online safety
- b.** Ensures parents and carers are aware of what their children are being asked to do online, including the sites they will be asked to access and who they will be interacting with online

13.10. Expected conduct and Incident management

13.10.1. All users:

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

13.10.2. Staff, volunteers and contractors

- a.** 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
- b.** 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

13.10.3. Parents/Carers:

- a.** Should provide consent for students to use the Internet, as well as other technologies, as part of the Parent Consent form
- b.** 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.

13.11. Incident Management

- 13.11.1. There is strict monitoring and application of the online safety policy and a differentiated and appropriate range of sanctions
- 13.11.2. 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
- 13.11.3. 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
- 13.11.4. Monitoring and reporting of online safety incidents takes place and contribute to developments in policy and practice in online safety within BEP Group
- 13.11.5. Parents/carers are specifically informed of online safety incidents involving young people for whom they are responsible
- 13.11.6. 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
- 13.11.7. We will immediately refer any suspected illegal material to the appropriate authorities

13.12. CCTV

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

13.13. Digital images and video

- 13.13.1. We gain parental/carers 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)
- 13.13.2. 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
- 13.13.3. 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
- 13.13.4. 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
- 13.13.5. BEP Group blocks/filter access to social networking sites unless there is a specific approved educational purpose
- 13.13.6. 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
- 13.13.7. 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.
- 13.13.8. 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

13.14. Remote Education

- 13.14.1. BEP group communicates with parents and students on staying safe whilst participating in remote education (see Annex 5 for Parent/Carer communication).
- 13.14.2. Remote education will be provided in a number of formats:
 - a.** Paper based student workbooks posted out on a regular basis and collected for marking once completed
 - b.** E- workbooks published on our secure learning platform using Microsoft Office 365

c. Live lessons using Microsoft Teams.

13.14.3. We do not believe these formats pose additional safeguarding risks and can actually bring many benefits, including improved engagement. BEP Group ensures the following points are adhered to when broadcasting live lessons:

- a.** use neutral or plain backgrounds
- b.** ensure appropriate privacy settings are in place
- c.** ensure staff understand and know how to set up and apply controls relating to pupil and student interactions, including microphones and cameras
- d.** set up lessons with password protection and ensure passwords are kept securely and not shared
- e.** ensure all staff, pupils, students, parents and carers have a clear understanding of expectations around behaviour and participation

14. Supervisory arrangements for the management of children in Alternative Provision and in out of school hours' activities.

- 14.1. The cohort of pupils in Alternative Provision often have complex needs, BEP Group is aware of the additional risk of harm that their pupils may be vulnerable to and follow the latest DfE statutory guidance to ensure the safety of all children in Alternative Provision.
- 14.2. The Department has issued two pieces of statutory guidance to which BEP Group have regard:

[Alternative provision - DfE Statutory Guidance](#); and

[Education for children with health needs who cannot attend school - DfE Statutory Guidance](#)

Annex 1 - Abuse

1. What is Abuse?

All staff should be aware of indicators of abuse and neglect, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online (an ever-evolving area of risk). Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

These definitions are from 'Working Together' (2018) and 'Keeping Children Safe in Education' (2022):

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children; children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic / misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

- 1.1. These categories overlap and an abused child does frequently suffer more than one type of abuse:

1.1.1. **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.

1.1.2. **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

Domestic abuse in their own intimate relationships (teenage relationship abuse)

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.

1.1.3. **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.

1.1.4. **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

1.2. 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 2018. 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.

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- being more prone to peer group isolation than other children

- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers
- cognitive understanding – being able to understand the difference between fact and fiction in online content and then repeating the content / behaviours in school or the consequences of doing so

Children who are lesbian, gay, bi or trans (LGBT) can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

1.2.1. Physical Abuse

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

1.2.2. Emotional Abuse

- a. Physical, mental, emotional or developmental lag
- b. Domestic violence
- c. Disclosure of punishment which appears excessive
- d. Over-reaction to making mistakes or fear of punishment
- e. Continual self-deprecation
- f. Sudden speech disorders
- g. Fear of new situations
- h. Inappropriate responses to painful situations
- i. Neurotic behaviours
- j. Self-harm
- k. Fear of parents being contacted
- l. Extremes of passivity or aggression
- m. Drug or solvent abuse
- n. Running away
- o. Compulsive stealing, scavenging

1.2.3. Sexual Abuse

- a. Sudden changes in behaviour
- b. Displays of affection which are inappropriate

- c. Alleged promiscuity or sexualised behaviour
- d. Fear of undressing
- e. Regression to younger behaviour
- f. Inappropriate internet use and possible 'grooming' concerns
- g. Genital itching or other genital/anal pain/injury
- h. Distrust of familiar adult
- i. Unexplained gifts of money, mobile phones etc.
- j. Depression and withdrawal
- k. Apparent secrecy about social activities or the identity of "special friends"
- l. Wetting or soiling, day and night
- m. Sleep disturbances or nightmares
- n. Chronic illness, especially throat infections and sexually transmitted disease

1.2.4. Neglect

- a. Constant hunger
- b. Poor personal hygiene
- c. Constant tiredness
- d. Poor state of clothing
- e. Frequent lateness or non-attendance at BEP Group
- f. Untreated medical problems or unmet special needs
- g. Low self-esteem
- h. Neurotic behaviour
- i. Poor social relationships
- j. Deterioration in BEP Group performance
- k. Running away
- l. Compulsive stealing or scavenging

2. Specific forms of abuse

2.1. Child abduction and community safety incidents

- 2.1.1. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.
- 2.1.2. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.
- 2.1.3. Staff will remain vigilant throughout the school day and patrol the areas immediately around the school.
- 2.1.4. If any suspicious behaviour is observed or people unknown to the school are seen, their presence must be reported the Entre/School Manager immediately.
- 2.1.5. The children affected should be asked to return to the school site, and the site secured.
- 2.1.6. The incident, together with as much detail as possible should be reported to the police either online or by phone using the 101 service or 999 if you believe there is an immediate threat.
- 2.1.7. If you believe there may be a wider threat to the occupants of the school site, the Critical Incident Policy/Procedure should be followed.

2.2. Children and the court system

- 2.2.1. All staff should be aware that any child involved in legal proceedings should be made known to the Designated Safeguarding Lead.
- 2.2.2. Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.
- 2.2.3. Where there is a family break up making child arrangements via the family courts following separation can be stressful and entrench conflict in families.
- 2.2.4. Additional guidance for children can be found at <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

2.3. Children who are absent from education

- 2.3.1. A child going absent from education is a potential indicator of abuse or neglect. Staff should follow the school's procedures for unauthorised absence and for dealing with children that go

missing from education, particularly on repeat occasions.

- 2.3.2. All staff should be aware that children being absent from education for prolonged periods and / or on repeat occasions can act as a vital warning sign of a range of safeguarding possibilities.
- 2.3.3. This may include abuse and neglect, which may include neglect, sexual abuse or exploitation and child criminal exploitation.
- 2.3.4. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage.
- 2.3.5. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in the future
- 2.3.6. Where school absence indicates safeguarding concerns, working with the local authority to improve school attendance. This includes when problems are first emerging but also when children are already known to local authority children's social care and need a social worker (such as a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
- 2.3.7. Staff should be aware of the school unauthorised absence and children absent from education procedures.
- 2.3.8. The school holds at least two contact numbers for every child. These will be used as part of the First Day Calling process.

2.4. Children with family members in prison

- 2.4.1. Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.
- 2.4.2. Staff must inform the Designated Safeguarding Lead if they know a child has a family member in prison.
- 2.4.3. Further information can be found at <https://www.nicco.org.uk/>

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

DfE description:

"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. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as

increased status) of the perpetrator or facilitator.

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

Children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content."

Keeping Children Safe in Education (DfE, 2022)

2.6. Child Sexual Exploitation (CSE)

- 2.6.1. 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.
- 2.6.2. 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.
- 2.6.3. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- 2.6.4. CSE is a form of child sexual abuse.
- 2.6.5. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing.
- 2.6.6. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation

for abuse including via the internet.

- 2.6.7. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.
- 2.6.8. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- 2.6.9. Staff should be aware of the key indicators of children being sexually exploited which can include:
 - a. Going missing for periods of time or regularly coming home late
 - b. Regularly missing education or not taking part in education
 - c. Appearing with unexplained gifts or new possessions
 - d. Associating with other young people involved in exploitation
 - e. Having older boyfriends or girlfriends
 - f. Suffering from sexually transmitted infections
 - g. Mood swings or changes in emotional wellbeing
 - h. Drug and alcohol misuse
 - i. Displaying inappropriate sexualised behaviour
- 2.6.10. Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.
- 2.6.11. There are three main types of child sexual exploitation:
 - a. 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.
 - b. 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.
 - c. 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.

2.7. **Criminal exploitation of children (CCE) and County Lines...**

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. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit

- 2.7.1. Criminal Exploitation can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or threatening/committing serious violence to others.
- 2.7.2. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.
- 2.7.3. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- 2.7.4. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.
- 2.7.5. **ACTIONS**
 - a. 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.
 - b. The Designated Safeguarding Lead (DSL) will lead on any concerns and work with other agencies as appropriate.
 - c. The DSL will consider a referral using the Local Authority pathways or a direct referral using the National Referral mechanism for human trafficking.

2.8. Modern Slavery and the National Referral Mechanism (NRM)

- 2.8.1. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
- 2.8.2. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
- 2.8.3. The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.
- 2.8.4. If the potential victim is under 18, or may be under 18, a NRM referral must be made. Child victims do not have to consent to be referred into the NRM and must first be safeguarded and then referred into the NRM process.
- 2.8.5. Only 'First-responder organisations' can make referrals, in our case this will tend to be the police or local authority. If you feel the child or family member may be subject to modern slavery, a referral to 101 (on-line or by telephone) or the the Local Authority must be made.
- 2.8.6. More information is available at <https://www.gov.uk/government/collections/modern-slavery>

2.9. Cybercrime

- 2.9.1. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;
 - a. unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
 - b. denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
 - c. making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
- 2.9.2. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
- 2.9.3. If there are concerns about a child in this area, the designated safeguarding lead should consider referring into the Cyber Choices programme

- 2.9.4. Cyber Choices information can be found at <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

2.10. Domestic Abuse

- 2.10.1. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- 2.10.2. 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.
- 2.10.3. 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.
- 2.10.4. The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children.
- 2.10.5. Exposure to domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 2.10.6. Domestic abuse affecting young people can also occur within their personal relationships (sometimes known as 'teenage relationship abuse'), as well as in the context of their home life.
- 2.10.7. Staff must inform the Designated Safeguarding Lead if they have concerns about a child.
- 2.10.8. Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the designated safeguarding lead in school before the child or children arrive at school the following day.

- 2.10.9. More details can be found here:
<https://www.operationencompass.org/>

2.11. Serious Violence

- 2.11.1. There are a number of indicators, which may signal that a child is at risk from or involved with serious violent crime.
- 2.11.2. 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.
- 2.11.3. 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.

2.12. Homelessness

- 2.12.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- 2.12.2. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.
- 2.12.3. There should always be a referral if a child has been harmed or is at risk of harm.
- 2.12.4. In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it is also be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.
- 2.12.5. Children's services will be the lead agency for these young people and the designated safeguarding lead will ensure appropriate referrals are made based on the child's circumstances.
- 2.12.6. Staff must inform the Designated Safeguarding Lead if they have concerns about a child.

2.13. So-called honour-based abuse

- 2.13.1. 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.

2.14. Female Genital Mutilation (FGM):

- 2.14.1. 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.
- 2.14.2. FGM typically takes place between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8.
- 2.14.3. 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.
- 2.14.4. This will usually come from a disclosure.
- 2.14.5. Under no circumstances should BEP Group staff physically examine pupils.
- 2.14.6. Our school will operate in accordance with the statutory requirements relating to FGM in line with the London Child Protection Procedures including making a referral to the local authority.
- 2.14.7. 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.
- 2.14.8. 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.
- 2.14.9. Victims of FGM are likely to come from a community that is known to practise FGM.
- 2.14.10. 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.
- 2.14.11. Risk factors for FGM include:
 - a. Low level of integration into UK society
 - b. Mother or a sister who has undergone FGM
 - c. Girls who are withdrawn from PSHE
 - d. Visiting female elder from the country of origin
 - e. Being taken on a long holiday to the country of origin
 - f. Talk about a 'special' procedure to become a woman
- 2.14.12. Symptoms of FGM
 - a. 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.

2.14.13. Indications that FGM may have already taken place may include:

- a. Difficulty walking, sitting or standing and may even look uncomfortable.
- b. Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- c. Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- d. Frequent urinary, menstrual or stomach problems.
- e. Prolonged or repeated absences from BEP Group or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- f. Reluctance to undergo normal medical examinations.
- g. Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- h. Talking about pain or discomfort between her legs.

2.15. **Forced marriage**

- 2.15.1. A forced marriage is one that is entered into without the full consent of one or both parties.
- 2.15.2. It is where violence, threats or other forms of coercion is used and is a crime.
- 2.15.3. Any concerns should be reported to the DSL
- 2.15.4. BEP Group follow the guidelines set out in [The Right To Choose Government Guidance](#)

2.16. **Prevent, Radicalisation and Extremism:**

- 2.16.1. BEP Group's duty under the counter terrorism and security act.
- 2.16.2. As part of the Counter Terrorism and Security Act 2015, BEP Group have a duty to 'prevent people being drawn into terrorism'.
- 2.16.3. This has become known as the 'Prevent Duty'.
- 2.16.4. Where staff are concerned that children and young people are developing or are susceptible to extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.
- 2.16.5. 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.
- 2.16.6. 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.

- 2.16.7. 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.
- 2.16.8. 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.
- 2.16.9. BEP Group commits to:
 - a. 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
 - b. 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;
 - c. be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.
- 2.16.10. Recognising Extremism - Early indicators of radicalisation or extremism may include:
 - a. Showing sympathy for extremist causes
 - b. Glorifying violence, especially to other faiths or cultures
 - c. Making remarks or comments about being at extremist events or rallies outside BEP Group
 - d. Evidence of possessing illegal or extremist literature
 - e. Advocating messages similar to illegal organisations or other extremist groups
 - f. 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.)
 - g. Secretive behaviour
 - h. Online searches or sharing extremist messages or social profiles
 - i. Intolerance of difference, including faith, culture, gender, race or sexuality
 - j. Graffiti, art work or writing that displays extremist themes
 - k. Attempts to impose extremist views or practices on others
 - l. Verbalising anti-Western or anti-British views
 - m. Advocating violence towards others

2.17. Channel

- 2.17.1. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism.

- 2.17.2. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required.
- 2.17.3. A representative from the school or college may be asked to attend the Channel panel to help with this assessment.
- 2.17.4. An individual will be required to provide their consent before any support delivered through the program is provided.

2.18. Sharing nudes and semi nudes (formerly Sexting):

- 2.18.1. The term 'sexting' relates to the taking, sending of indecent images, videos and/or written messages with sexually explicit content of children (under the age of 18).
- 2.18.2. These are created and sent electronically. They are often 'shared' via social networking sites and instant messaging services.
- 2.18.3. BEP Group will not tolerate sexting, it is inappropriate and illegal amongst young people and can have extremely damaging and long-lasting consequences.
- 2.18.4. 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.
- 2.18.5. Images should not be viewed by staff under any circumstances.
- 2.18.6. UKCCIS "Sexting in school and colleges" will be used to triage concerns. This extract gives the initial actions that should be taken:
 - a. There should always be an initial review meeting, led by the DSL. This should consider the initial evidence and aim to establish facts.
 - b. Whether there is an immediate risk to a young person or young people
 - c. Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
 - d. 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?
 - e. Are there any adults involved in the sharing of imagery?
 - f. What is the impact on the pupils involved?
 - g. Do the pupils involved have additional vulnerabilities?
 - h. Does the young person understand consent?
 - i. Has the young person taken part in this kind of activity before?
 - j. If a referral should be made to the police and/or children's social care
 - k. Imagery should not be viewed.
 - l. What further information is required to decide on the best response?

- m. Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
 - n. Whether immediate action should be taken to delete or remove images from devices or online services.
 - o. Any relevant facts about the young people involved which would influence risk assessment.
 - p. If there is a need to contact another school, college, setting or individual.
 - q. Whether to contact parents or carers of the pupils involved - in most cases parents should be involved.
- 2.18.7. An immediate referral to police and/or children's social care should be made if at this initial stage:
- a. The incident involves an adult
 - b. 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)
 - c. 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
 - d. The imagery involves sexual acts and any pupil in the imagery is under 13
 - e. 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
- 2.18.8. 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).
- 2.18.9. 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.
- 2.18.10. Judging whether harm is significant is not a straightforward task. The kind of factors that are considered are:
- a. 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.
 - b. The extent of premeditation by the carer. A single loss of temper, without serious consequence, followed by remorse and reconciliation, would cause less concern than a premeditated act.
 - c. Whether the alleged perpetrator accepts responsibility for what they have done and accepts that it was wrong.
 - d. 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.

- e. Long term concerns about possible emotional abuse or neglect, which have been resistant to attempts to help.

2.19. Child-on-child Abuse

- 2.19.1. Children can abuse other children. This may include physically, sexually or emotionally hurting others.
- 2.19.2. All staff should recognise that children are capable of abusing their peers. This abuse may take place in school, out of school or online.
- 2.19.3. The school has a 'zero tolerance' approach to all forms of child-on-child abuse.
- 2.19.4. There is a clear recognition that even when there are no reported cases of child-on-child abuse, such abuse is likely to be taking place, and not reported.
- 2.19.5. The school has a clear attitude of 'it could happen here', and when working in partnership with local schools this is revised to 'it does happen here'.
- 2.19.6. The school recognises that failing to understand the scale of harassment and abuse or downplaying some behaviours would lead to an unsafe environment, and a culture that could normalise abuse, meaning that children would accept it as normal, and not report.
- 2.19.7. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 2.19.8. The school has system in place, well promoted, accessible and understood for children to confidently report abuse, knowing their concerns will be treated seriously.
- 2.19.9. All staff should be aware of safeguarding issues from child-on-child abuse including:
 - a. bullying (including cyber bullying, prejudice based bullying and discriminatory bullying)
 - b. abuse in intimate relationships
 - c. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - d. sexual violence such as rape, assault by penetration and sexual assault;(this may include an online element which facilitates, threatens and/or encourages sexual violence)
 - e. sexual harassment: unwanted conduct of a sexual nature' that can occur online and offline and both inside and

outside of school. It is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It can include telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, sexual "jokes" or taunting which may be standalone or part of a broader pattern of abuse

- f. physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. displaying pictures, photos or drawings of a sexual nature
- g. online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - o sharing of unwanted explicit content
 - o sexualised online bullying
 - o unwanted sexual comments and messages, including, on social media
 - o sexual exploitation; coercion and threats
 - o coercing others into sharing images of themselves or performing acts they're not comfortable with online.
- h. causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- i. consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- j. upskirting, (this is a criminal offence) which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- k. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

2.19.10. The school recognises the different forms of child-on-child abuse and is clear that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up".

2.19.11. This abuse can:

- a. be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences
- b. result in significant, long lasting and traumatic isolation, intimidation or violence to the victim; vulnerable adults are at particular risk of harm

2.19.12. Children or young people who harm others may have additional or complex needs eg:

- a. significant disruption in their own lives
- b. exposure to domestic abuse or witnessing or suffering abuse
- c. educational under-achievement
- d. involved in crime

2.20. Recognising child-on-child abuse

2.20.1. An assessment of an incident between children should be completed and consider:

- a. chronological and developmental ages of everyone involved
- b. difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability. Is the alleged perpetrator significantly older, more mature, more confident or has well known social standing?
- c. all alleged physical and verbal aspects of the behaviour and incident
- d. whether the behaviour involved inappropriate sexual knowledge or motivation
- e. what was the degree of physical aggression, intimidation, threatening behaviour or bribery
- f. the effect on the victim
- g. any attempts to ensure the behaviour and incident is kept a secret
- h. the child or young person's motivation or reason for the behaviour, if they admit that it occurred
- i. whether this was a one-off incident, or longer in duration
- j. that sexual violence and sexual harassment can take place within intimate personal relationships between children
- k. the importance of understanding intra familial harms and any necessary support for siblings following incidents
- l. are there ongoing risks to the victim, other children or school staff

2.20.2. Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse as it can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

2.20.3. It is important to deal with a situation of child-on-child abuse immediately and sensitively.

2.20.4. It is necessary to gather the information as soon as possible to get the true facts.

2.20.5. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved.

- 2.20.6. Avoid language that may create a 'blame' culture and leave a child labelled.
- 2.20.7. Staff will talk to the children in a calm and consistent manner. Staff will not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.
- 2.20.8. It is important that a victim should never be made to feel ashamed for making a report. It is important to explain the law is in place to protect children and young people rather than criminalise them, and this is to be explained in a way that avoids alarming or distressing them.
- 2.20.9. Preventing abuse

The school knows what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred, staff know that they can take any concerns to the DSL. The DSL knows what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and is confident in accessing this support.

2.21. Harmful Sexual Behaviour

- 2.21.1. Children's sexual behaviour exists on a wide continuum. It ranges from normal and developmentally expected (age-appropriate), to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.
- 2.21.2. This is known as Harmful Sexual Behaviour and it can occur online or in person, or simultaneously. Our school recognises that children are vulnerable to and also capable of harmful sexual behaviour.
- 2.21.3. We take any allegation of abuse between our children seriously and follow our child protection procedures if a report of harmful sexual behaviour is made.
- 2.21.4. This may include seeking advice and support from other agencies as appropriate. Decisions are made considering the age and developmental stages of any child involved.
- 2.21.5. We also consider any other factors as appropriate and balance this with our duty and responsibilities to protect all children.
- 2.21.6. Within this policy we use the following widely used and recognised terms in places: 'victim(s)' and 'alleged perpetrator(s)'.
- 2.21.7. We recognise that a child who has reported abuse may not consider themselves to be a victim and may not want to be described in this way.
- 2.21.8. We also recognise that a child who is reported to have displayed abusive behaviour may not consider that they have done so, and

that if abusive behaviour has occurred it will have been impactful to them too. We are conscious of the language we use when managing reported abuse, especially when speaking with our children, and will consider this on a case-by-case basis. We are prepared to use any term which our children are most comfortable with.

2.21.9. The Department for Education (DfE) publishes statutory guidance that sets out how schools should manage reports of child-on-child sexual violence and harassment (harmful sexual behaviour).

2.21.10. **Sexual violence means:**

- a. Sexual offences definitions under the Sexual Offences Act 2003 (The following definitions have been taken directly from KCSIE)
- b. **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- c. **Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- d. **Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- e. **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.
- f. **Consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

- i. a child under the age of 13 can never consent to any sexual activity
- ii. the age of consent is 16
- iii. sexual intercourse without consent is rape

2.21.11. **Sexual harassment**

- a. This means unwanted conduct of a sexual nature, which can occur online and offline and both inside and outside of school, including:
 - i. sexual comments (telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names)
 - ii. sexual 'jokes' or taunting
 - iii. physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes
 - iv. displaying pictures, photos, or drawings of a sexual nature; and
 - v. upskirting, which typically involves taking a picture or video under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, and / or to cause the victim humiliation, distress, or alarm (this is a criminal offence).

2.21.12. **Online sexual harassment**

- a. This can be a single event, or part of a wider pattern of sexual harassment and / or sexual violence. It may include:
 - i. consensual and non-consensual sharing of nude and semi-nude images and/or videos (this is a criminal offence)
 - ii. sharing of unwanted explicit content
 - iii. sexualised online bullying
 - iv. unwanted sexual comments and messages, including, on social media;
 - v. sexual exploitation, coercion, and threats; and

- vi. coercing others into sharing images of themselves or performing acts they are not comfortable with online.

2.21.13. Taking Action

- a. Always take complaints seriously
- b. Gain a statement of facts from the pupil(s)
- c. Assess needs of victim and alleged perpetrator

The DSL will:

- d. consider referral to Police or Social Care
- e. contribute to multi-agency assessments
- f. convene a risk management meeting
- g. record all incidents and all action taken

2.21.14. Recording sexualised behaviour

- a. be clear, explicit and non-avoidant, and avoid vague statements or euphemisms
- b. record as soon as possible, as you can quickly forget or confuse detail
- c. follow the prompts on your safeguarding and child protection recording form
- d. use proper names for body parts but record exactly any language or vocabulary used by the child. Use the child's exact words in quotation marks.
- e. note where and when the incident happened and whether anyone else was around.

2.21.15. Gather the Facts

- a. Speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account.
- b. Ask the young people to tell you what happened.
- c. Use open questions, 'where, when, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?).
- d. Do not interrogate or ask leading questions.

2.21.16. Consider the Intent

- a. Has this been a deliberate or contrived situation for a young person to be able to harm another?

2.21.17. Decide on the next course of action

- a. If you believe any young person to be at risk of significant harm you must report to the Designated Safeguarding Lead immediately; they will follow the school's Safeguarding and Child Protection Policy.
- b. If the police intend to pursue this further, they may ask to interview the young people in school or they may ask for

parents to come to school to be spoken to.

- c. It is important to be prepared for every situation and the potential time it may take.

2.21.18. **Informing parents/carers**

- a. The best way to inform parents/carers is face to face.
- b. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents/carers whether their child is the child who was harmed or who harmed another.
- c. In all circumstances where the risk of harm to the child is evident then the school should encourage the young person to share the information with their parent/carer (they may be scared to tell parents/carers that they are being harmed in any way).

2.21.19. **Points to consider**

- a. **What is the age of the children involved?**
How old are the young people involved in the incident and is there any age difference between those involved? In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked.
- b. **Where did the incident or incidents take place?** Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?
- c. **What was the explanation by all children involved of what occurred?** Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?
- d. **What is each of the children's own understanding of what occurred?** Do the young people know/understand what they are doing? Eg, do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?
- e. **Repetition.** Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt

with and appropriately resolved?

- f. **Next Steps.** Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.
- g. The school will follow DfE Sexual Violence and Sexual Harassment guidance (2023).

2.22. Unsubstantiated, unfounded, false or malicious reports

- 2.22.1. All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.
- 2.22.2. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care maybe appropriate.
- 2.22.3. If a report is shown to be deliberately invented or malicious, the school, should consider whether any disciplinary action is appropriate against the individual who made it (following the school behaviour policy).

2.23. Ongoing response - safeguarding and supporting the victim, the alleged perpetrator(s) and children and who have displayed Harmful Sexual Behaviour (HSB)

- 2.23.1. The following principles are used to help shape any decisions:
 - a. The needs and wishes of the victim will be paramount.
 - b. Consideration of the age and development stage of the victim and the perpetrator, nature of the allegations and the potential risk of further abuse.
 - c. The victim will never be made to feel they are the problem or made to feel ashamed.
 - d. Proportionality of response. Support will be tailored on a case-by-case basis.
 - e. A holistic approach with an awareness of health needs associated with sexual assault including physical, mental and sexual health problems and unwanted pregnancy.
- 2.23.2. BEP Academy will consider the need to safeguard the victim (and the wider student body) whilst also providing all parties with an education, appropriate safeguarding support and implement any disciplinary sanctions. Taking disciplinary action and still providing

appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary and where appropriate.

- 2.23.3. It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 2.23.4. We will consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- 2.23.5. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.
- 2.23.6. BEP Academy recognises that school can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor we will consider before final decisions are made.
- 2.23.7. If an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution will be made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.
- 2.23.8. **Sanctions and the alleged perpetrator(s)**

With regard to the alleged perpetrator(s), advice on behaviour in schools is clear that teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them.
- 2.23.9. Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent BEP Academy from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This will be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) will take a leading role.
- 2.23.10. BEP Academy will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care will be used to help decide.
- 2.23.11. BEP Academy will also consider whether there are circumstances that make it unreasonable or irrational for the school to reach its

own view about what happened while an independent investigation is considering the same facts.

2.23.12. Discipline and support

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct.

- 2.23.13. BEP Academy will make it clear as to which category (disciplinary or support) any action we are taking falls or whether it is really both and will ensure that the action complies with the law relating to each relevant category.

2.23.14. Working with parents and carers

BEP Academy will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and will be considered on a case-by-case basis).

- 2.23.15. The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. BEP Academy will carefully consider what information they provide to the respective parents or carers about the other child involved and when we do so.
- 2.23.16. In some cases, local authority children's social care and/or the police will have a very clear view and the school will work with relevant agencies to ensure a consistent approach is taken to information sharing.
- 2.23.17. BEP Academy will, where possible and relevant meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place in school to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.
- 2.23.18. BEP Academy will, where possible and relevant meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator will be discussed.
- 2.23.19. The designated safeguarding lead (or a deputy) would generally attend any such meetings. Consideration to the attendance of other agencies will be considered on a case-by-case basis.

2.23.20. Safeguarding other children

Consideration will be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides".

- 2.23.21. We are aware that social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves.
- 2.23.22. BEP Academy will be doing all they can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.
- 2.23.23. BEP Academy promotes a whole school approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated.
- 2.23.24. BEP Academy aims to provide a strong preventative education programme that will help create an environment in which all children at the school are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.
- 2.23.25. BEP Academy will keep their policies, processes, and curriculum under constant review to protect all their children. Patterns identified in school may also be reflective of the wider issues within a local area and BEP Academy will share emerging trends with safeguarding partners.

2.24. Online Bullying

- 2.24.1. Online Bullying is the use of technology (social networking, messaging, text messages, e-mail, chat rooms etc.) to harass threaten or intimidate someone for the same reasons as stated above.
- 2.24.2. Online bullying can take many forms:
 - a. Abusive or threatening texts, emails or messages
 - b. Posting abusive comments on social media sites
 - c. Sharing humiliating videos or photos of someone else
 - d. Stealing someone's online identity
 - e. Spreading rumours online
 - f. Trolling – sending someone menacing or upsetting messages through social networks, chatrooms or games
 - g. Developing hate sites about another person
 - h. Prank calls or messages
 - i. Group bullying or exclusion online

- j. Anonymous messaging
- k. Encouraging a young person to self-harm
- l. Pressuring children to send sexual messages or engaging in sexual conversations

2.24.3. If you suspect a child may be subject to online bullying, you must inform the DSL

2.25. Upskirting

2.25.1. 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.

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

2.25.3. Anyone of any sex, can be a victim.

2.26. Substance abuse

2.26.1. This policy applies at all times on the school premises, as well as on offsite educational visits.

2.26.2. Definition

The substances referred to either directly or indirectly in this policy are: 'Drugs' taken here to mean those that are legal, yet age restricted, such as alcohol, tobacco and solvents, over the counter and prescribed drugs and illegal drugs such as cannabis, ecstasy, amphetamines, heroin, crack/cocaine, LSD, etc.

2.26.3. Policy principles

2.26.4. BEP Academy believes that the possession and, or use of, such substances in school, during the school day, while travelling to or from school, or on a school organised visit, is both wrong and incompatible with our aims.

2.26.5. The drugs/substances covered by this policy are not to be bought, sold or otherwise exchanged or brought onto school premises during the school day or while students are on organised visits.

2.26.6. BEP Academy is a smoke-free environment and, in accordance with the law, no one student, staff, contractor or visitor may smoke in any part of the school.

2.26.7. The use of substances whilst identifiable as a student at BEP Academy is also deemed to be unacceptable, even if this takes place outside school hours. As such, the school has the legal right to impose sanctions for 'bringing the school into disrepute'.

2.26.8. If a member of the school staff suspects that a student is abusing substances outside school, they must inform the Safeguarding Team.

- 2.26.9. Students known to be abusing substances should be referred (assuming they are compliant) to Drug Support services.
- 2.26.10. However individual exceptions may be made for students who require prescription medicines where appropriate (in accordance with the school's Policy on Medicines)
- 2.26.11. BEP Academy is thoroughly committed to ensuring our students receive quality, up-to-date Drug and Alcohol Education. The principles of which are:
 - a. to provide accurate and up-to-date information about drugs/alcohol
 - b. to increase understanding about the implications and possible consequences of drugs/alcohol use and misuse
 - c. to widen understanding about related health and social issues
 - d. to promote positive attitudes to healthy lifestyles
 - e. to enable students to make informed and healthy choices
 - f. to enable young people to identify sources of appropriate advice and personal support.
- 2.26.12. The Curriculum
- 2.26.13. The issue of substance abuse is specifically addressed through PD lessons where, in addition to form tutors, it is delivered by specialist agencies.
- 2.26.14. Dealing with Substance Abuse related incidents
- 2.26.15. Any medical emergencies should be dealt with via recourse to emergency services as a priority.
- 2.26.16. In cases of substance use or supply on the premises, during the school day or during school visits, the case should be discussed with the student(s) and a written record taken.
- 2.26.17. Parents/carers should be informed as soon as possible. If the student is judged to be adversely affected by the substance, she should be removed from the premises by parents/carers. Upon return, the student will then be subject to the usual disciplinary procedures.
- 2.26.18. Substances should be returned to parents/carers if they are legal but age inappropriate. If the substance is illegal, or thought to be illegal, it should be stored in a container and kept in the school safely. This should be witnessed by at least two members of staff. The school should then contact the police and the substance transferred to their care.
- 2.26.19. When it is suspected that substance abuse may have taken place out school (weekends or evening), staff must inform the Safeguarding Team.

- 2.26.20. The issue should be discussed with the student and recorded. If there is reasonable suspicion, parents/carers should be informed and the student advised of support organisations.

2.27. Mental Health

- 2.27.1. Mental health is the concern of the whole community and we recognise that schools play a key part in this.
- 2.27.2. 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.
- 2.27.3. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resilience.
- 2.27.4. 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.
- 2.27.5. 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.
- 2.27.6. 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.
- 2.27.7. 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.
- 2.27.8. 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.
- 2.27.9. The child will be supported to access services using the appropriate Local Authority help and support pathways.
- 2.27.10. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 2.27.11. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.
- 2.27.12. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

2.28. Children requiring mental health support

- 2.28.1. 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.
- 2.28.2. Safeguarding and the promotion of a child's welfare covers all aspects of the child's life, and the school is committed to ensuring that all its actions in respect of a child are compatible with this aim.
- 2.28.3. If there are concerns about a child's welfare that do not meet the thresholds of child abuse the school will consider whether the Early Help approach should be considered.
- 2.28.4. 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.
- 2.28.5. We work in partnership with external agencies including the Local Authority and CAMHs to support children and their families

Annex 2 - Dealing with Disclosure

1. It is vital that our actions do not abuse the child further or prejudice further enquiries, for example:
 - 1.1. Recognise that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person receiving the disclosure recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
 - 1.2. Recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
 - 1.3. Stay calm, listen to the child and if you are shocked by what is being said try not to show it.
 - 1.4. Do not promise confidentiality; reassure the child they have done the right thing. Explain who you will have to tell and why.
 - 1.5. Reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
 - 1.6. Keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
 - 1.7. If a child is making a disclosure the pace should be dictated by the child. Listen carefully to the child, reflect back, use the child's language, be non-judgmental, be clear about boundaries and how the report will be progressed, do not ask leading questions and only prompt the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
 - 1.8. Accept what they are telling you; do not make judgements.
 - 1.9. Reassure the child that they have done the right thing in telling you. Do acknowledge how hard it was for them to tell you.
 - 1.10. Do not criticise the perpetrator; this may be someone they love.
 - 1.11. Tell them what you will do next and with whom the information will be shared.
 - 1.12. Pass this information on immediately to your Designated Safeguarding Lead.

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

1. STOP:

- a. Ensure that the young person understands that you are unable to keep information confidential if you are concerned for their safety and wellbeing. *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.'
 - b. If possible, ask the young person if they are happy for you to request that someone from the safeguarding team to join the conversation. If they say that they don't want to, explain again that you will need to pass the information on to that team for them to take the appropriate action.
 - c. If at this point, the young person decides not continue with the disclosure, what has already been disclosed should be immediately communicated to the safeguarding team verbally and details sent via the 'Cause for Concern' section of the database.
 - d. The young person should be informed that this will happen.
 - e. ***Remember – never press the young person for details.***
2. Collect a disclosure record form from the key worker desk, head of school office or print from the 'Cause for Concern' database screen

3. LOOK:

- a. 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.

4. LISTEN:

- a. carefully to what you are being told.
- b. 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.

- c. 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.

5. DISCUSS:

- a. Ask the young person if they have any specific outcomes they want to achieve.

- b. Go through possible options (including specialist advisers) and talk through next steps and what could happen.

6. RECORD:

- a. Any records must be factual – do not include information if you are not sure if it's factual.
- b. The following areas should be covered where possible:
 - i. The young person's name
 - ii. Date, time and place of disclosure and who was present
 - iii. The date, time and place of any incident and your factual observations
 - iv. The nature of the suspected abuse
 - v. Factual observations including, marks, injuries, unusual behaviours
 - vi. What was said by the young person
 - vii. Whether any other person was involved
 - viii. What was said to the young person
 - ix. What was said by any other person, e.g. parent, sibling, other child or young person, or colleague
 - x. The referrer's professional relationship to the family
 - xi. Action taken at the time
 - xii. Nature of discussion with manager
 - xiii. Subsequent action taken

7. Discuss IMMEDIATELY with the DSL or a Deputy DSL.

- 8. Raise a "Cause for Concern" on the database, which will send an email to the safeguarding team who will ensure that the BEP Group Reporting Procedure can be followed.

You must always pass on this information on the day of disclosure

Annex 3 - Disclosure record form

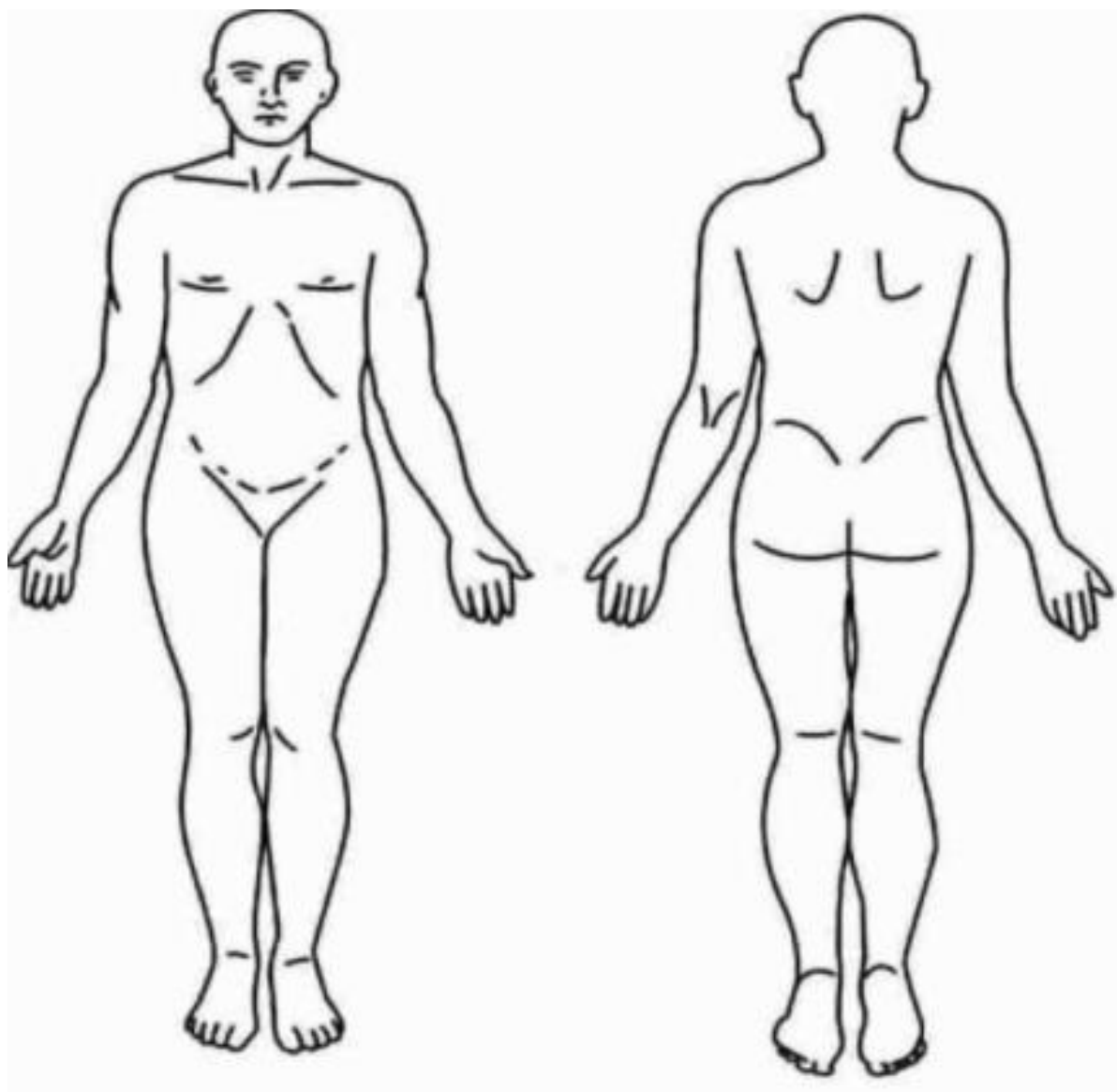
Staff, volunteers and regular visitors are required to complete this form if a young person makes a disclosure.

Information Required	Enter Information Here
Full name of child	
Your name	
Details of any other people present at disclosure (witnesses)	
Time and date form completed	
Location of where disclosure given	

Time & date of incident:	
Location of incident:	
Details of other people present at incident (Witnesses):	
Details of other people aware of the incident:	
Action taken at the time of the disclosure	

Information Required	Enter Information Here
<p>Nature of concern/disclosure</p> <p><i>Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you or any other person present said.</i></p> <p><i>[Ensure that if there is an injury this is recorded (size and shape) and a body map is completed]</i></p> <p><i>(Make a note of any unusual behaviour)</i></p> <p><i>[Make it clear if you have raised a concern about a similar issue previously]</i></p>	
<p>DSL team made aware <i>(include name of person informed)</i></p>	

Body Map



Indicate clearly where the injury was seen and attach this to the referral form

Safeguarding team only to complete the following:

Information Required	Enter information here
Safeguarding Staff Member name:	
Date	
Subsequent action taken <i>(include details of all follow up action taken including any external referrals made)</i>	

Annex 4 – Dealing with a safeguarding concern?

NB: Disclosure: If a child makes a disclosure to you, follow the procedure in Annex 2

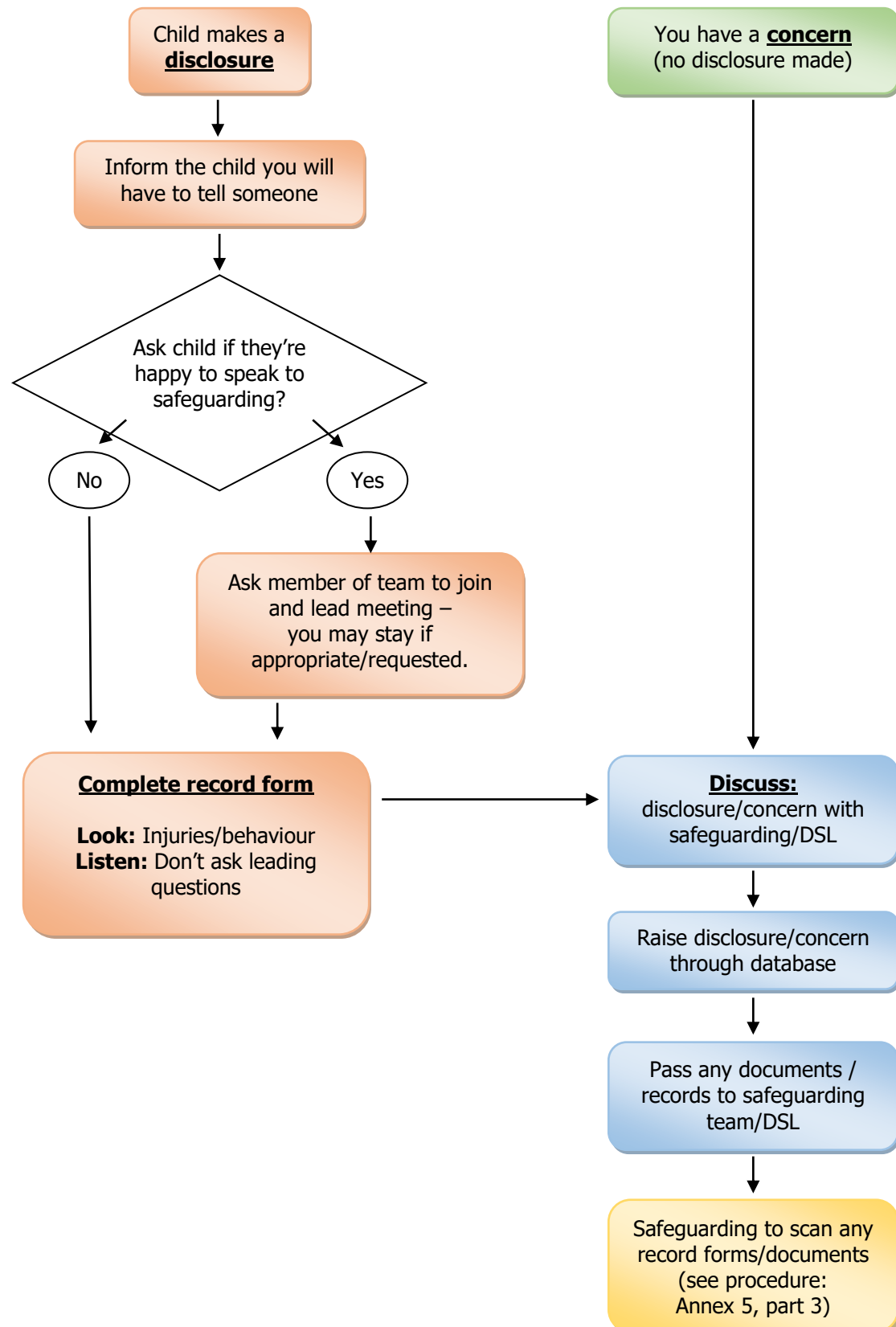
1. Concern:

If you have a safeguarding concern (seen something, overheard a conversation, etc) please follow the process from 2. below.

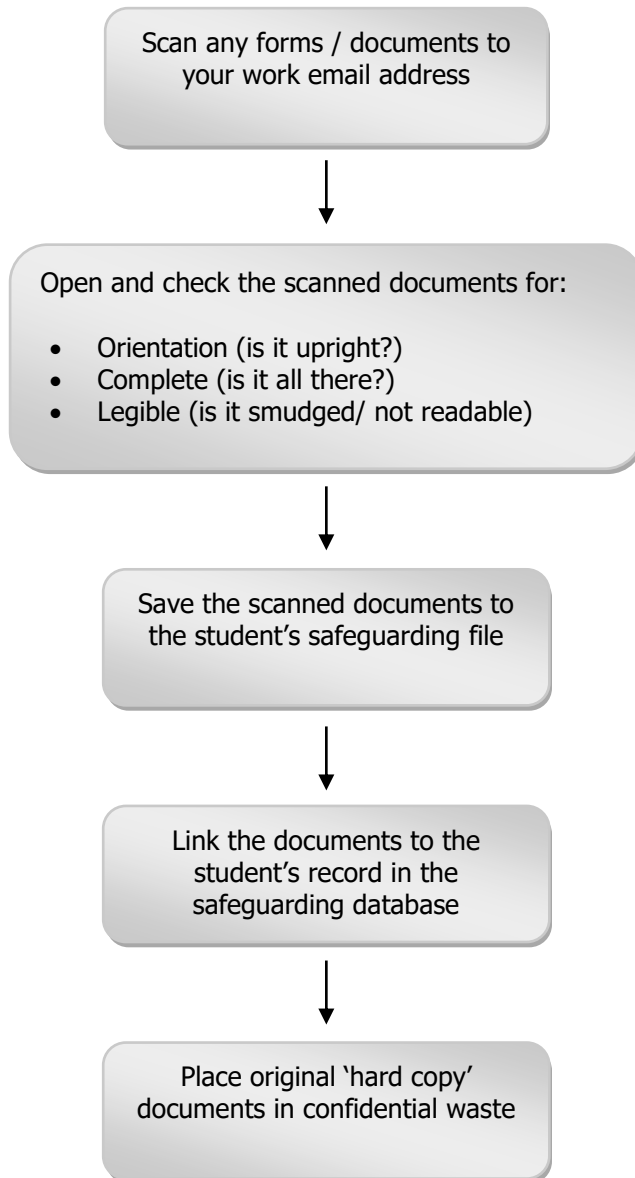
Flowchart: Both processes are illustrated in the flowcharts in Annex 5

2. Find and speak to a safeguarding officer (listed below) or, if not available a member of the leadership team.
3. Raise and record your concern through the database

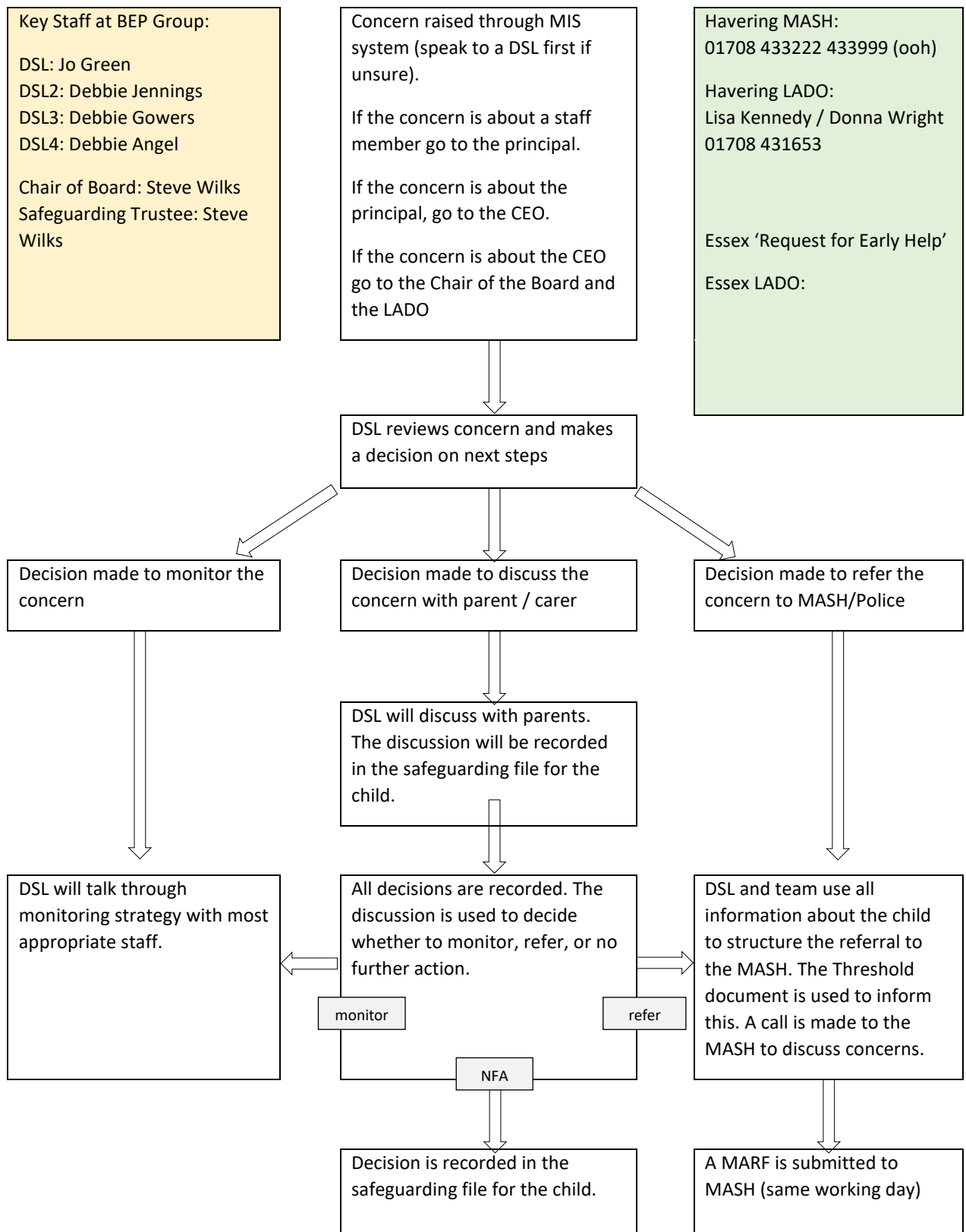
Annex 5 - Safeguarding flowchart (Part 1) disclosure or concern?



Annex 5 - Safeguarding flowchart (Part 2) scanning and attaching documents



Annex 5 - Safeguarding flowchart (Part 3) after concern raised



Annex 6 - 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:
<ul style="list-style-type: none"> • 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 	<p>Refer to Key Worker</p> <p>Escalate to: Head of School</p>
Category B infringements	Possible Sanctions:
<ul style="list-style-type: none"> • 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 	<p>Head of School / Senior Manager / Safeguarding lead</p> <p>Escalate to:</p> <p>removal of Internet access rights for a period / removal of phone until end of day / contact with parent]</p>

STUDENT	
Category C infringements	Possible Sanctions:
<ul style="list-style-type: none"> • 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 	<p>Refer to Head of School/ Online-Safety Coordinator / CEO / removal of Internet and/or Learning Platform access rights for a period</p> <p>Escalate to: contact with parents / removal of equipment</p> <p>Other safeguarding actions if inappropriate web material is accessed: Ensure appropriate technical support filters the site</p>
Category D infringements	Possible Sanctions:
<ul style="list-style-type: none"> • 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 	<p>Refer to Head of School / Safeguarding Lead/ Deputy CEO/ Contact with parents</p> <p>Other possible safeguarding actions:</p> <ul style="list-style-type: none"> • 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:
<ul style="list-style-type: none"> 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. 	<p>Referred to line manager / Deputy CEO</p> <p>Escalate to:</p> <p><i>Warning given</i></p>
Category B infringements (Gross Misconduct)	Possible Sanctions:
<ul style="list-style-type: none"> 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 	<p>Referred to CEO</p> <p>Other safeguarding actions:</p> <ul style="list-style-type: none"> 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. <p><i>Escalate to:</i></p> <p>Report to Police / CEOP where child abuse or illegal activity is suspected. ,</p>

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): Protecting children and young people from online sexual abuse through education

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.

Annex 7 - Remote education provision: information for parents

1. Background

- 1.1. This information is intended to provide clarity and transparency to pupils and parents or carers about what to expect from remote education where national or local restrictions require entire cohorts (or bubbles) to remain at home.
- 1.2. For details of what to expect where individual pupils are self-isolating, please see the final section of this page.

2. What should my child expect from immediate remote education in the first day or two of pupils being sent home?

- 2.1. A pupil's first day or two of being educated remotely might look different from our standard approach, while we take all necessary actions to prepare for a longer period of remote teaching.
- 2.2. Pupils will be able to access our remote learning portal. Where pupils do not have access to the portal, printed homework packs will be provided.

3. Following the first few days of remote education, will my child be taught broadly the same curriculum as they would if they were in school?

- 3.1. We teach the same curriculum remotely as we do in school wherever possible and appropriate. However, we have needed to make some adaptations in some subjects. For example, pupils will be unlikely to be able to complete some practical activities normally delivered through our vocational courses.

4. How long can I expect work set by the school to take my child each day?

- 4.1. We expect that remote education (including remote teaching and independent work) will take pupils broadly the same hours each day to when they are in school.

5. How will my child access any online remote education you are providing?

- 5.1. BEP Academy is using Microsoft Office 365 to provide our online learning portal.

6. If my child does not have digital or online access at home, how will you support them to access education?

- 6.1. We recognise that some pupils may not have suitable online resources at home to access all elements of remote learning. Pupils can access parts of the online learning on a PC/Mac, Xbox or PlayStation, or mobile phone. We can talk you and your child through the process of accessing different elements of provision.

7. How will my child be taught remotely?

7.1. We use a combination of the following approaches to teach pupils remotely:

- 7.1.1. live teaching (online lessons) delivered via Microsoft Teams
- 7.1.2. printed packs produced by teachers (e.g. workbooks, worksheets)
- 7.1.3. reading books pupils have at home
- 7.1.4. commercially available websites supporting the teaching of specific subjects or areas, including video clips or sequences
- 7.1.5. long-term project work and/or internet research activities (as per the schools full opening guidance, schools are expected to avoid an over-reliance on these approaches)

8. What are your expectations for my child's engagement and the support that we as parents and carers should provide at home?

- 8.1. Children will benefit from having a regular routine for home schooling.
- 8.2. Having somewhere to sit, away from distraction and too much noise will allow pupils to participate in online learning.
- 8.3. We are providing online learning and homework packs in a way that should help you engage in your child's learning, so you can help them. If they are struggling, please encourage your child to contact the school either via email, telephone or text.

9. How will you check whether my child is engaging with their work and how will I be informed if there are concerns?

- 9.1. Your child will be asked to submit work online, either through assignments (via Teams), by email or through live lessons.
- 9.2. Tutors will mark work and provide feedback via the portal.
- 9.3. Our attendance team will make daily phone calls to you, to check on your child's welfare.
- 9.4. Your child will also receive at least one telephone call per week and will be asked to participate in a mentoring session with either a member of our pastoral team, or a tutor if appropriate.
- 9.5. Online records will also be checked to ensure your child is accessing their email, Teams (live lessons) and Class Notebook (online work packs).

10. How will you assess my child's work and progress?

- 10.1. Feedback can take many forms and may not always mean extensive written comments for individual children. For example, whole-class feedback or quizzes marked automatically via digital platforms are also valid and effective methods, amongst many others.
- 10.2. Our approach to feeding back on pupil work will include verbal feedback in live lessons, marked quizzes and tests, written feedback in class notebooks, target setting and termly progress reviews.

11. How will you work with me to help my child who needs additional support from adults at home to access remote education?

- 11.1. We recognise that some pupils, for example some pupils with special educational needs and disabilities (SEND), may not be able to access remote education without support from adults at home. We acknowledge the difficulties this may place on families, and we will work with parents and carers to support those pupils in the following ways:

- 11.2. We have a senior teacher who is able to provide specific support for accessing learning.
 - 11.3. We have set up additional small-group live lessons for children with specific/additional needs to allow tutors to work at the appropriate pace and offer targeted support to learners.
 - 11.4. All work packs and online lessons (class notebooks) have been set out in the exactly the same format, regardless of lesson. Each section within the work pack has an explanation and background to the subject, some worked examples to follow with your child, and some questions for your child to answer.
 - 11.5. As you work your way through the pack, the tasks and sections become increasingly more challenging. We expect all children should be able to complete the 'mild' sections, most children should be able to complete the 'hot' and some children will be able to complete the 'super-hot' sections. The hot and super-hot sections are there as extension activities.
 - 11.6. Sometimes, at the end of the pack, you will find answers/solutions to some of the sections, to allow you and your child to work together and check the learning.
12. Remote education for self-isolating pupils
- 12.1. Where individual pupils need to self-isolate, but the majority of their peer group remains in school, how remote education is provided will likely differ from the approach for whole groups. This is due to the challenges of teaching pupils both at home and in school.
13. If my child is not in school because they are self-isolating, how will their remote education differ from the approaches described above?
- 13.1. We will continue to provide a 'blended' approach to remote learning, involving some live lessons, homework packs (class notebooks) and mentoring sessions.