



# BEP Group: Policy Pack

staff, volunteers, learners & consultants



## **Safeguarding** Policies and Procedures

Last Review: August 2026, Next Review: August 2027

## **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**

Version control is contained within a separate document, available on our website.

## **Keeping Children Safe in Education – (KCSIE), 2026 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.'

## **DfE Statutory Guidance**

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

- Keeping Children Safe In Education - Sept 2026
- Working Together to Safeguard Children – 2023
- London Safeguarding Children Procedures 7th edition (2025)
- DfE Teaching Online Safety in schools 2023

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>

## Introduction

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 of the statutory guidance, which they are required to read in full.

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.

School must be a safe place for all children attending. Children not attending school during this time must also be safeguarded, including online, staff must identify, and the school must action any concerns brought to them.

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

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

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

# Contents

## 1. Safeguarding Students and vulnerable adults

- 1.1. Policy
- 1.2. Procedure
- 1.3. Responsibilities
- 1.4. Additional Safeguarding Responsibilities
- 1.5. Confidentiality
- 1.6. Training (Including Part One of KCSIE)
- 1.7. Supporting Children
- 1.8. Early and Family Help
- 1.9. Private Fostering (Kinship arrangement)
- 1.10. Managing Child Protection Cases
- 1.11. Bullying
- 1.12. Allegations Against Staff
- 1.13. Whistle blowing
- 1.14. Information Sharing
- 1.15. Sport and Physical Activity

## 2. Child-on-child Abuse (including harassment and violence)

- 2.1. Background and school approach
- 2.2. Recognising peer abuse
- 2.3. Making or sharing of nudes or semi-nudes (including AI-generated, e.g. deepfakes)
- 2.4. Online bullying
- 2.5. Upskirting

## 3. Child-on-child sexual harassment and sexual violence

- 3.1. Understanding harmful sexual behaviour (HSB), sexual harassment and sexual violence
- 3.2. Harmful sexual behaviour (HSB)
- 3.3. Sexual harassment
- 3.4. Sexual violence
- 3.5. Sexual assault
- 3.6. Causing someone to engage in sexual activity without consent
- 3.7. Consent
- 3.8. Preventing abuse
- 3.9. Responding to reports of HSB, sexual harassment and/or sexual violence
- 3.10. Unsubstantiated, unfounded, false or malicious reports
- 3.11. Ongoing response, Safeguarding and supporting the victim and Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour (HSB)
- 3.12. Safeguarding other children

## 4. Safer Recruitment

- 4.1. Policy
- 4.2. Procedure
- 4.3. Responsibilities
- 4.4. DBS Disclosure Checks
- 4.5. Security of Information

## **5. Restrictive Interventions**

- 5.1. Policy
- 5.2. Staff training
- 5.3. Deciding when to use Force
- 5.4. Restraint
- 5.5. Seclusion
- 5.6. Recording
- 5.7. Reporting
- 5.8. Post Incident Support
- 5.9. Corporal punishment

## **6. Supervision of Students and vulnerable adults**

- 6.1. Policy
- 6.2. Responsibilities
- 6.3. Supervision of Breaks

## **7. Children potentially at greater risk of harm**

- 7.1. Mental health
- 7.2. Children requiring mental health support
- 7.3. Elective home education (EHE)
- 7.4. Substance abuse
- 7.5. Young carers
- 7.6. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions
- 7.7. Children who are lesbian, gay, bisexual
- 7.8. Children who are questioning their gender

## **8. Student or vulnerable adult gone missing on or off site**

- 8.1. Policy
- 8.2. Procedure
- 8.3. Responsibilities
- 8.4. Reducing the Risk of a Missing Student

## **9. Critical Incident (Lockdown, Evacuation and Bomb threat)**

- 9.1. Introduction
- 9.2. Lockdown
- 9.3. Partial lockdown
- 9.4. Full lockdown
- 9.5. Evacuation
- 9.6. Bomb threat
- 9.7. Deciding to evacuate
- 9.8. Police attendance and searching buildings
- 9.9. Post – incident investigation

## **10. Security (mention Martyn's Law??)**

- 10.1. Policy
- 10.2. Procedure
- 10.3. Responsibilities
- 10.4. Assessments

## **11. Visitors and Contractors**

- 11.1. Policy
- 11.2. Responsibilities

## **12. Student/Client Illness**

- 12.1. Policy
- 12.2. Responsibilities

## **13. Administering Medicines**

- 13.1. Policy
- 13.2. Responsibilities
- 13.3. Administration of Prescribed Medicines
- 13.4. Medication Records
- 13.5. Security
- 13.6. Educational Visits
- 13.7. Sporting Activities

## **14. Supporting Pupils with Medical Conditions (Including Allergies and Anaphylaxis)**

- 14.1. Rationale
- 14.2. Statement
- 14.3. Scope
- 14.4. Responsibilities
- 14.5. Individual Healthcare Plans
- 14.6. Managing medicines in school
- 14.7. Staff training
- 14.8. Educational visits

## **15. Online Safety**

- 15.1. Introduction and Overview
- 15.2. The main areas of risk
- 15.3. Scope
- 15.4. Roles and responsibilities
- 15.5. Communication
- 15.6. Handling Incidents
- 15.7. Education and Curriculum
- 15.8. Staff training
- 15.9. Parent awareness
- 15.10. Expected conduct and Incident management
- 15.11. Incident Management
- 15.12. CCTV
- 15.13. Digital images and video
- 15.14. Remote Education
- 15.15. Mobile Phones

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

## **Annexes**

### **1. Further information**

- 1.1. Child abduction and community safety incidents
- 1.2. Children and the court system
- 1.3. Children who are absent from education
- 1.4. Children with family members in prison
- 1.5. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) including County Lines
- 1.6. Child Sexual Exploitation
- 1.7. Child Criminal Exploitation and County Lines
- 1.8. Modern slavery and the National Referral Mechanism
- 1.9. Cybercrime
- 1.10. Domestic abuse
- 1.11. Serious Violence
- 1.12. Homelessness
- 1.13. So-called Honour or faith-based abuse
- 1.14. Female Genital Mutilation (FGM)
- 1.15. Forced marriage
- 1.16. Prevent, radicalisation and extremism
- 1.17. Channel

### **2. Disclosure**

- 2.1. Dealing with disclosure
- 2.2. Recording disclosure
- 2.3. Discuss immediately with DSL/DDSL

### **3. Dealing with a safeguarding concern**

### **4. Online Safety Infringements and Sanctions**

### **5. Parent Information – Useful Links**

# 1. Safeguarding Students and vulnerable adults

## 1.1. Policy

- 1.1.1. 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.
- 1.1.2. 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.
- 1.1.3. 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.
- 1.1.4. 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 or Family Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse.
- 1.1.5. 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
- 1.1.6. We have in place procedures to ensure that we meet our responsibilities for safeguarding Students and vulnerable adults from abuse.
- 1.1.7. We have in place procedures to ensure that all staff are protected against allegations of abuse.
- 1.1.8. This policy and procedures should be read in conjunction with policies listed above.
- 1.1.9. This policy and the following procedures apply to all paid staff, volunteers and governors working with or in BEP Group

## 1.2. **Procedure**

- 1.2.1. The following procedures outline the action to be taken if it is suspected that a child may be being abused, exploited, harmed or neglected. There are four categories of abuse:
- a. Physical Abuse
  - b. Emotional Abuse
  - c. Sexual Abuse
  - d. Neglect

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

- 1.2.2. All new members of staff, supply staff and volunteers, as part of the induction process, will be made aware of the following:
- a. Safeguarding Policy (this policy), which includes Child-on-child Abuse (including harassment and violence)
  - 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

- f. All members of staff will read the latest version of Keeping Children Safe in Education Part 1.
  - g. Senior Leadership will support all staff in understanding these key documents and implementing it in their practice.
- 1.2.3. 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/>.
- 1.2.4. All concerns must be reported to the Safeguarding hub and discussed immediately. A DSL or DDSL will decide the appropriate action in consultation with the SMT.
- 1.2.5. 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 or DDSL if they have concerns about a child.
- 1.2.6. It is important that staff determine how best to build a trusted relationship with children and young people which helps to facilitate communication.
- 1.2.7. 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.
- 1.2.8. 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.
- 1.2.9. All staff must be aware of the school's 'Whistleblowing and Managing Allegations Policy' and how to access it.
- 1.2.10. 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.
- 1.2.11. 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 the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.
- 1.2.12. 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.

- 1.2.13. 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.
- 1.2.14. All parents, as part of the child induction process, will be made aware of the Safeguarding and Child Protection Policy.
- 1.2.15. Support will be provided for staff who may feel distressed from being involved with a case of abuse. These staff may be offered supervision.

### 1.3. **Responsibilities**

- 1.3.1. 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 Safeguarding Lead – DSL
  - c. nominate the Chief Executive to liaise with the DSL
  - d. have in place safer recruitment procedures
  - e. ensure that DBS checks are undertaken for everyone working with children
  - f. undertake regular appropriate safeguarding training. 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. be aware of their obligations under data protection laws (Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025) to process personal information fairly and lawfully and to keep any information held safe and secure
  - j. review the policy annually and make appropriate amendments
- 1.3.2. 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

1.3.3. The Designated Safeguarding Lead (DSL) 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 leaves who is currently subject to a Child Protection Plan, 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. where a child has a social worker, liaise with the relevant Virtual School Head (VSH), who has strategic oversight of the educational attendance, attainment and progress of children with a social worker, and ensure the VSH is informed of any attendance or safeguarding concerns relating to these children.

- p. The DSL is **Jo Green** and the deputies (DDSLs) are **Lauren Scott and Debbie Jennings**.
- q. Ensure continuity of safeguarding responsibilities, robust cover arrangements are in place for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances.
- r. Ensure that all members of the safeguarding team are notified of concerns via the BEP Academy safeguarding hub operates a Safeguarding Hub in which all concerns are automatically logged to the safeguarding system and notified to all members of the DSL Hub simultaneously, so that concerns are received, monitored and acted upon without delay.
- s. Ensure that all members of the safeguarding team are trained to the same standard as the designated safeguarding lead.
- t. Ensure that appropriate members of staff are available to attend a strategy meeting or child protection conference wherever practically possible.

1.3.4. Staff must be:

- a. aware of this policy and procedures
- b. aware of the indicators of abuse, neglect exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online
- c. aware of the names of the DSLs
- d. trained in identifying signs of harm and abuse
- e. know how to report any suspected case of harm or abuse
- f. kept up to date with changes in procedures
- g. aim to continually monitor and review their practice and ensure they follow the guidance contained in this document.
- h. self-report if their conduct or behaviour falls short of these guiding principles

**1.4. Additional Safeguarding Responsibilities:**

**1.4.1. 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.

**1.4.2. 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

**1.4.3. 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 of 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 or DDSL Team, followed by submitting a report to the safeguarding hub.

**1.5. Confidentiality**

- 1.5.1. Confidentiality is a very difficult issue but all personnel have a professional responsibility to share information with other professionals who are investigating a case.
- 1.5.2. A child, when confiding information to a member of staff, must be made aware that for the child's own sake this information cannot be kept secret and will only be shared with people that need to know, who will decide what to do next.
- 1.5.3. All child protection records are regarded as confidential and will be kept in a secure place.
- 1.5.4. 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.

- 1.5.5. 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.
- 1.5.6. The Designated Safeguarding Lead or another member of the safeguarding team will attend all Child Protection Case Conferences if appropriate.
- 1.5.7. The Designated Safeguarding Lead or another member of the safeguarding team will attend all Core Group meetings once a child has been placed on the Child Protection Register, if it is felt to be appropriate

## 1.6. **Training**

- 1.6.1. Whilst not exhaustive, we have identified the following staff training needs:
  - a. All staff will receive training on Part One of Keeping Children Safe in Education both as part of their initial induction and annually in August (which also includes Abuse/types of abuse).
  - b. Designated Safeguarding Lead(s) and Deputy DSLs will receive Level Three training at least every two years (from 2021).
  - c. Annual positive handling, safe intervention and de-escalation.
  - d. Safer recruitment training for staff involved in the recruitment process.

## 1.7. **Supporting Children**

- 1.7.1. We recognise that a child who is abused or witnesses' violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child in these circumstances may feel helpless and humiliated. We recognise that a child may feel self-blame.
- 1.7.2. We recognise that the organisation may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 1.7.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 1.7.4. 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.
- 1.7.5. 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.

- 1.7.6. 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).

## 1.8. **Early and Family Help**

- 1.8.1. Staff should be aware of the two tiers of support available. Community-based Early Help is delivered through universal services, including education, health, youth services and housing provision, and is the first point of support when a problem is emerging. Where a child or family requires more targeted support, this is provided through Family Help, coordinated by the local authority and/or partners. Safeguarding staff should be familiar with the local threshold document and the criteria for referral to each level.
- 1.8.2. Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- 1.8.3. At BEP Academy we also liaise with a wide variety of outside agencies, many of which can 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.
- 1.8.4. 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.
- 1.8.5. We encourage families, students and parents to work with these partner agencies. 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.
- 1.8.6. Children who may require early help or family help

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

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

- a. is disabled and has specific additional needs
  - b. has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - c. has a mental health need
  - d. is a young carer
  - e. is pregnant and / or is a parent themselves
  - f. has exhibited early signs of abusive, violent and/or harmful behaviours
  - g. is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
  - h. is frequently missing / goes missing from education, home or care
  - i. has experienced multiple suspensions or is at risk of being permanently excluded from school
  - j. is at risk of modern slavery, trafficking, sexual and or criminal exploitation
  - k. is at risk of being radicalised or exploited
  - l. has a parent or carer in custody, or is affected by parental offending
  - m. is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic violence
  - n. is misusing alcohol or drugs themselves
  - o. is at risk of so-called 'honour' or faith-based abuse such as female genital mutilation or forced marriage
  - p. is a privately fostered child
  - q. has returned home to their family from care; and/or is showing early signs of abuse and/or neglect.
- 1.8.7. 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 appropriate local referral process for Early Help or Family Help.
- 1.8.8. When a safeguarding concern has been assessed, options will include: managing any support for the child internally via the BEP Academy's own pastoral support processes, including considering whether to inform parents or carers to further support the child's wellbeing;

undertaking a family help assessment; or making a referral to statutory services.

- 1.8.9. In line with managing internally, BEP Academy may decide that the children involved do not require referral to statutory services but may benefit from other support.
- 1.8.10. Universal services and community-based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.
- 1.8.11. Managing a report internally and seeking community-based Early Help are not mutually exclusive. The DSL/DDSL will consider doing both simultaneously for the victim and alleged perpetrator.
- 1.8.12. Where children and families require more targeted support than community-based Early Help can provide, the DSL / DDSL team will consider referral to Family Help. Family Help provides targeted early help services coordinated by the local authority and/or partners to address specific concerns within a family, including parenting support, mental health support, youth services and housing services. Family Help is a voluntary approach and requires the family's consent.
- 1.8.13. Where a child has been harmed, is at risk of harm, or is in immediate danger, the DSL / DDSL team will make a referral to local authority children's social care. The school will not wait for the outcome of a children's social care investigation before taking steps to protect the victim and other children.
- 1.8.14. If a statutory assessment is not appropriate, the DSL / DDSL team will consider other support mechanisms including Family Help, specialist support and pastoral support.
- 1.8.15. The DSL and DDSL will be aware of the local Early Help and Family Help processes are, how and where to access support.

#### 1.9. **Private Fostering (Kinship arrangement)**

- 1.9.1. A private fostering (Kinship) 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.
- 1.9.2. 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.
- 1.9.3. 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.
- 1.9.4. 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.

- 1.9.5. BEP Academy have a mandatory duty to report to the local authority and Virtual Head Teacher where we are aware or suspect that a child is subject to a private fostering (Kinship) 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.
- 1.9.6. BEP Academy staff should notify the designated safeguarding lead when they become aware of private fostering (Kinship) 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 (Kinship) arrangements.
- 1.9.7. On admission to BEP Academy, we will take steps to verify the relationship of the adults to the child who is being registered.

**1.10. Managing Child Protection Cases**

- 1.10.1. 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.
- 1.10.2. 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.
- 1.10.3. 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).
- 1.10.4. BEP Academy will establish with the social care team any additional reporting requirements.
- 1.10.5. The Designated Safeguarding Lead and team will contribute to the child protection investigation and attend or contribute to the Strategy meetings.
- 1.10.6. 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.
- 1.10.7. 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.
- 1.10.8. 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.
- 1.10.9. If a child with a Child Protection Plan has an unexplained absence from school, the Designated Safeguarding Lead will inform the Social Worker.

1.11. **Bullying**

- 1.11.1. Our policy on bullying is set out in our behaviour policy.

1.12. **Allegations against staff**

- 1.12.1. BEP Academy understand that a child may make an allegation against a member of staff.
- 1.12.2. If such an allegation is made (no matter how small), the member of staff receiving the allegation or having the concern will immediately inform the principal.
- 1.12.3. On all such occasions the principal will discuss the content of the allegation with Local Authority Designated Officer (LADO).
- 1.12.4. Where a low-level concern is shared, the Principal and CEO will discuss the concern and will decide on the most appropriate course of action. If there is any doubt as whether the information shared reaches the harm threshold, they will consult with the Local Authority Designated Officer (LADO).
- 1.12.5. 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.
- 1.12.6. If the allegation made to the member of staff concerns the Principal, the member of staff will immediately inform the CEO who will consult with the Local Authority Designated Officer (LADO).
- 1.12.7. As an organisation we follow the London Child Protection Procedures for dealing with allegations against staff.

1.13. **Whistle blowing**

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

1.14. **Information Sharing**

- 1.14.1. BEP Academy follows the DfE "Information Sharing – advice for practitioners providing safeguarding services to children, young people, parent and carers" guidance and procedures.
- 1.14.2. 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.
- 1.14.3. 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.

- 1.14.4. The Designated Safeguarding Lead will ensure that detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions are kept.
- 1.14.5. The Designated Safeguarding Lead will consider in each case whether a referral should be made to another agency such as local authority children's social care or the Prevent programme, and will record the rationale for that decision.
- 1.14.6. Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging or where a child is already known to local authority children's social care.
- 1.14.7. Data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. Where safeguarding of children is the purpose, practitioners may share special category personal data without consent where there is good reason to do so and sharing will enhance the safeguarding of a child in a timely manner.
- 1.14.8. Where a child leaves BEP Academy, the DSL should consider whether it would be appropriate to share any information with the new school in advance of the child leaving, particularly where information would support an assessment of risk to others or allow the new school to continue supporting children who have had a social worker, been victims of abuse, are receiving support through the Channel programme, or where there are concerns about serious violence or harmful behaviours.

#### 1.15. **Sport and Physical Activity**

- 1.15.1. BEP Academy recognises that sport and physical activity are an important part of pupils' education and wellbeing. All sporting activities will be conducted in a safe and supportive environment with appropriate supervision.
- 1.15.2. Staff supervising sporting activities should be aware of their safeguarding responsibilities and report any concerns about a child's welfare or behaviour to the DSL or DDSL team in the usual way.
- 1.15.3. Where sports activities are taught or played in single-sex groups for reasons of safety or fairness, there should be no exceptions where safety is the concern. BEP Academy can separate children according to their biological sex in competitive sport without discriminating unlawfully under the Equality Act 2010.
- 1.15.4. Where a gender-questioning child makes a request relating to how they participate in sport, the school will consider the request carefully, taking into account the child's best interests, the impact on other children, and the aim of creating safe and fair environments for all children to participate.
- 1.15.5. BEP Academy uses external providers and facilities for sport and physical activity. All external facilities are risk assessed before use.
- 1.15.6. External providers are required to ensure that changing accommodation and shower facilities are suitable for the pupils they

are provided for, having regard to their ages, numbers and sex, and any special requirements they may have.

- 1.15.7. When responding to a request to support any degree of social transition, BEP Academy will not allow a child access to changing facilities designated for the opposite sex.
- 1.15.8. If a gender-questioning pupil does not want to use the changing facilities designated for their sex, BEP Academy will discuss alternative arrangements with the provider, ensuring these do not compromise the safety, comfort, privacy or dignity of the pupil concerned or of any other pupils.
- 1.15.9. The DSL must be informed of any such arrangements and a clear record kept.
- 1.15.10. Any safeguarding concerns arising during sporting activities, whether on or off site, should be reported to the DSL or DDSL team immediately and recorded in the usual way.

## **2. Child-on-child Abuse (including harassment and violence)**

### **2.1. Background and school approach**

- 2.1.1. Children can abuse other children. This may include physically, sexually or emotionally hurting others.
- 2.1.2. All BEP Academy should recognise that children are capable of abusing their peers. This abuse may take place in school, out of school or online.
- 2.1.3. All staff should know that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator, and that it is preventable. Timely, evidence-based intervention and early identification of concerning behaviour are key to preventing escalation.
- 2.1.4. BEP Academy has a 'zero tolerance' approach to all forms of Child-on-child Abuse (including harassment and violence)
- 2.1.5. There is a clear recognition that even when there are no reported cases of Child-on-child Abuse (including harassment and violence), such abuse is likely to be taking place and not reported.
- 2.1.6. BEP Academy 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'.
- 2.1.7. BEP Academy 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.
- 2.1.8. 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.
- 2.1.9. The school has system in place, well promoted, accessible and understood for children to confidently report abuse, knowing their concerns will be treated seriously.
- 2.1.10. All staff should be aware of safeguarding issues from Child-on-child Abuse (including harassment and violence) 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. serious physical assault and harm, or the threat of harm with a weapon
  - e. harmful sexual behaviour, including misogyny and misandry, 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)

- f. 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
- g. physical behaviour, such as:
  - i. deliberately brushing against someone
  - ii. interfering with someone's clothes
  - iii. displaying pictures, photos or drawings of a sexual nature

2.1.11. BEP Academy recognises the different forms of Child-on-child Abuse (including harassment and violence) and is clear that abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up".

2.1.12. 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

2.1.13. 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

## 2.2. **Recognising Child-on-child Abuse (including harassment and violence)**

2.2.1. 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
- 2.2.2. 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, misogyny and misandry and 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.
- 2.2.3. It is important to deal with a situation of Child-on-child Abuse (including harassment and violence) immediately and sensitively.
- 2.2.4. It is necessary to gather the information as soon as possible to get the true facts.
- 2.2.5. 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.
- 2.2.6. Avoid language that may create a 'blame' culture and leave a child labelled.
- 2.2.7. 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.
- 2.2.8. 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.

**2.3. Making or sharing of nudes or semi-nudes (including AI-generated, e.g. deepfakes)**

- 2.3.1. Making or sharing of nudes or semi-nudes refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.
- 2.3.2. BEP Group will not tolerate the making or sharing of nudes or semi-nudes, which is inappropriate and illegal amongst young people and can have extremely damaging and long-lasting consequences.
- 2.3.3. The making or sharing of nudes or semi-nudes is unacceptable behaviour. The misuse of electronic communication in this way, including via social media, online chat groups and messaging services, is a potential safeguarding concern and may constitute cyber-bullying or online grooming.
- 2.3.4. Images should not be viewed by staff under any circumstances.
- 2.3.5. UKCIS guidance on sharing of nudes and semi-nudes 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.
- 2.3.6. 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
- 2.3.7. If none of the above apply, then BEP Academy may decide to respond to the incident without involving the police or children's social care (BEP Academy can choose to escalate the incident at any time if further information/concerns come to light).
- 2.3.8. 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 Academy's pastoral support and disciplinary framework and if appropriate local network of support.
- 2.3.9. 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.

## 2.4. **Online bullying**

- 2.4.1. 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.
- 2.4.2. 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
- 2.4.3. If you suspect a child may be subject to online bullying, you must inform the DSL or DDSL team

## 2.5. **Upskirting**

- 2.5.1. 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.
- 2.5.2. Upskirting, from 12 April 2019, is a criminal offence.
- 2.5.3. Anyone of any sex, can be a victim.

### 3. Child-on-child sexual harassment and sexual violence

#### 3.1. Understanding harmful sexual behaviour (HSB), sexual harassment and sexual violence

- 3.1.1. HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable. All staff should be aware of the importance of:
  - a. making clear that there is a zero-tolerance approach to sexual harassment and sexual violence; that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, misogyny, 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,
  - b. recognising, acknowledging, and understanding the scale of HSB, sexual harassment and sexual violence and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported,
  - c. recognising the escalatory nature of misogyny and the benefits of early identification to support BEP Academy's approach to minimising the risk of HSB, sexual harassment and sexual violence,
  - d. challenging behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them,
- 3.1.2. Children who are victims of HSB, sexual harassment or sexual violence wherever it happens, may find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.
- 3.1.3. Whilst any report of HSB, sexual harassment or sexual violence should be taken seriously, staff should be aware it is more likely girls will be the victims of sexual harassment and sexual violence and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers.
- 3.1.4. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

#### 3.2. Harmful sexual behaviour (HSB)

- 3.2.1. The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. HSB may escalate into sexual

harassment or sexual violence and our school recognises that children are both vulnerable to and capable of harmful sexual behaviour.

- 3.2.2. When assessing HSB, the ages and developmental stage of the children involved is critical. Behaviour may be considered harmful where there is a significant age difference (typically more than two years), or where one child is pre-pubescent and the other is not. A younger child may also abuse an older child, particularly where a power imbalance exists.
- 3.2.3. BEP Academy take any allegation of abuse between our children seriously and follow our child protection procedures if a report of harmful sexual behaviour is made.
- 3.2.4. 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.
- 3.2.5. We also consider any other factors as appropriate and balance this with our duty and responsibilities to protect all children.
- 3.2.6. Within this policy we use the following widely used and recognised terms in places: 'victim(s)' and 'alleged perpetrator(s)'.
- 3.2.7. 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.
- 3.2.8. 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.
- 3.2.9. 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).

### 3.3. **Sexual harassment (including online)**

- 3.3.1. This means unwanted conduct of a sexual nature, which can occur online and offline and both inside and outside of school, including:
- a. sexual comments (telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names)
  - b. sexual 'jokes' or taunting
  - c. physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes
  - d. displaying pictures, photos, or drawings of a sexual nature; and
  - e. upskirting (see separate section)

#### 3.3.2. Online

This can be a single event, or part of a wider pattern of sexual harassment and / or sexual violence. It may include:

- a. consensual and non-consensual making or sharing of nudes or semi-nudes (this is a criminal offence)
- b. sharing of unwanted explicit content
- c. sexualised online bullying
- d. unwanted sexual comments and messages, including, on social media
- e. sexual exploitation, coercion, and threats; and
- f. coercing others into sharing images of themselves or performing acts they are not comfortable with online.

- 3.3.3. All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, regardless of whether they are consensual or non-consensual. The response should be proportionate and should consider the ages and circumstances of those involved.

### 3.4. **Sexual violence**

- 3.4.1. Sexual offences definitions under the Sexual Offences Act 2003 (The following definitions have been taken directly from KCSIE)
- a. 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.
  - b. 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.

**3.5. Sexual assault**

- 3.5.1. 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.)

**3.6. Causing someone to engage in sexual activity without consent (including what consent is)**

- 3.6.1. 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.

**3.7. Consent**

- 3.7.1. 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.

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

- 3.7.2. For further guidance refer to Rape Crisis England and Wales on sexual consent: <https://rapecrisis.org.uk/get-informed/about-sexual-violence/sexual-consent/>

**3.8. Preventing abuse**

- 3.8.1. BEP Academy 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 or DDSL team. The DSL / DDSL team 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.

**3.9. Responding to reports of HSB, sexual harassment and/or sexual violence**

- 3.9.1. Reports of harmful sexual behaviour, sexual harassment and sexual violence are likely to be complex and may require swift professional decisions. BEP Academy invests in pre-planning, effective staff training and robust safeguarding policies to provide a foundation for a calm and considered response when incidents arise.
- 3.9.2. Any decisions are made on a case-by-case basis, led by the DSL or a deputy using their professional judgement, supported by external

agencies including local authority children's social care and the police as needed.

### 3.9.3. **The immediate response to a report**

Children may struggle to verbally disclose abuse. Instead, they may show signs or behave in ways that signal distress, hoping that adults will notice and react. Disclosures may come indirectly, for example, through a friend, an overheard conversation that suggests a child has been harmed, or noticeable changes to a child's own behaviour which may indicate something is wrong. Staff should act immediately on any concerns about a child's welfare, rather than wait to be told.

### 3.9.4. **Considering confidentiality and anonymity**

BEP Academy staff will never promise confidentiality when receiving a report. It is in the best interests of the child to seek advice from others in order to provide appropriate support and engage relevant agencies.

Only essential staff and agencies should be involved; those directly supporting the child or participating in any investigation. If a child requests confidentiality, the DSL or a deputy will consider:

- a. Informing parents or carers, unless doing so increases the risk to the child
- b. Referring to local authority children's social care if the child is at risk of harm, in immediate danger, or has been harmed
- c. Reporting crimes such as rape, assault by penetration or sexual assault to the police. Even if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare rather than a criminal justice approach in these cases.

The DSL or a deputy will balance the child's wishes with the duty to protect them and other children. If a referral is made against a child's wishes, this will be handled with care, explained to the child, and appropriate specialist support offered.

Where an allegation of sexual harassment or sexual violence is progressing through the criminal justice system, BEP Academy will ensure staff understand the importance of anonymity, witness support and the criminal process so they can offer appropriate support.

BEP Academy will take reasonable steps to protect the anonymity of all children involved, including carefully deciding which staff need to know about a report and what support will be provided. Staff should be mindful of the potential impact of social media in spreading rumours and compromising children's identities.

### 3.9.5. **Risk and needs assessment**

Following a report of sexual violence, the DSL or a deputy will carry out an immediate risk and needs assessment. For a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

The risk and needs assessment will consider:

- a. The child's safety and support needs
- b. Potential other victims
- c. The alleged perpetrator(s)
- d. The wider school community including staff, and any actions appropriate to protect them from the alleged perpetrator(s) or from future harm
- e. The location and time of the incident, with steps to improve safety in that area

Risk and needs assessments must be recorded, regularly reviewed and used to inform ongoing safeguarding decisions. The DSL or a deputy will engage with local authority children's social care and specialist services as needed. In cases of sexual violence, professional risk assessments by social workers or sexual violence specialists are likely to be required. BEP Academy's risk assessment is not intended to replace the detailed assessments of expert professionals but will be informed by them.

**3.9.6. Action following a report of HSB, sexual harassment and/or sexual violence**

HSB, sexual harassment and sexual violence can happen anywhere. All staff will maintain an attitude of 'it could happen here' and respond appropriately to all reports and concerns whether they occur online, offline or outside of school.

**3.9.7. What to consider**

- a. The DSL or a deputy will lead the initial response, considering:
  - i. The child's wishes regarding how they want to proceed. Children will be given as much control as reasonably possible, balanced against BEP Academy's duty to protect others.
  - ii. The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB was displayed
  - iii. The ages and developmental stages of the children involved
  - iv. Any power imbalance between children, such as differences in age, maturity or social status, and whether the child has a disability or learning difficulty
  - v. Whether the alleged incident was isolated or part of a sustained pattern of abuse
  - vi. That sexual violence and sexual harassment can take place within intimate relationships between children
  - vii. The importance of understanding intrafamilial harm and support for siblings if needed
  - viii. Any ongoing risks to the child, other children or staff

**ix. Wider contextual concerns including links to CSE or CCE**

- b. All staff will act in the best interests of the child and follow general safeguarding principles. Immediate steps will be taken to support and protect the child, the alleged perpetrator(s) and any other affected children.
- c. Any report of sexual harassment or sexual violence is likely to be traumatic for the child. Children will be taken seriously, supported and kept safe. They will never be made to feel blamed, ashamed or that they are causing a problem by making a report.
- d. Where a report involves rape or assault by penetration, the alleged perpetrator(s) will be removed from any shared classes with the child while BEP Academy establishes the facts and liaises with local authority children's social care and the police. BEP Academy will also carefully consider how to maintain reasonable physical separation between the child and alleged perpetrator(s) across the school, including before or after school activities. These actions are in the best interests of all children involved and should not be perceived as a judgement on the guilt of the alleged perpetrator(s).
- e. For other reports of sexual harassment and sexual violence, decisions about shared classes and proximity on site will be considered immediately.
- f. All concerns, discussions, decisions and their rationale will be clearly recorded in writing.

**3.9.8. Options to manage the report**

BEP Academy will consider every report of HSB, sexual harassment and sexual violence on a case-by-case basis. When to inform the alleged perpetrator(s) will be carefully considered. If a referral to local authority children's social care and/or the police is being made, the DSL or a deputy will consult with those agencies to determine next steps, including how and when to inform the alleged perpetrator(s). BEP Academy will not delay taking immediate action to safeguard children.

**3.9.9. Manage internally**

In some cases, such as one-off incidents of HSB or sexual harassment, it may be appropriate for BEP Academy to manage the situation internally using the behaviour policy and providing pastoral support, without involving statutory services.

Regardless of the response, BEP Academy will make clear that there is a zero-tolerance approach to sexual harassment and sexual violence. It is never acceptable and will not be tolerated. All concerns, discussions, decisions and their rationale must be clearly recorded in writing.

**3.9.10. Universal services and community based Early Help assessment**

In line with managing internally, BEP Academy may decide that the children involved do not require referral to statutory services but may benefit from other support. Universal services and community-based Early Help play a crucial role in identifying emerging problems and providing support at an early stage.

Community-based Early Help and the option to manage a report internally are not mutually exclusive. BEP Academy may manage the situation internally and seek Early Help for both the child and the alleged perpetrator(s) simultaneously.

The DSL and deputies must be familiar with the local Early Help process and know how and where to access support.

All concerns, discussions, decisions and their rationale will be clearly recorded in writing.

#### **3.9.11. Referrals to Family Help – including targeted Early Help and local authority children's social care**

Where children and families require more targeted support than community-based Early Help can provide, the DSL will consider referral to Family Help. Family Help provides targeted early help services coordinated by the local authority and/or partners to address specific concerns, including parenting support, mental health support, youth services and housing services. Family Help is a voluntary approach and requires the family's consent.

Where a child has been harmed, is at risk of harm, or is in immediate danger, BEP Academy will make a referral to local authority children's social care. Parents or carers will generally be informed at the point of referral unless there are compelling reasons not to, such as if doing so would put the child at additional risk. Any such decision will be made with the support of local authority children's social care.

BEP Academy will not wait for the outcome of a children's social care investigation before protecting the child and other children. The DSL will work closely with the relevant lead social worker to ensure the best possible coordinated support is in place. If a statutory assessment is not appropriate, the DSL will consider Family Help, specialist support and pastoral support.

All concerns, discussions, decisions and their rationale will be clearly recorded in writing.

#### **3.9.12. Reporting to the police**

Any report to the police will generally be made in parallel with a referral to local authority children's social care.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this will be passed to the police. If the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare rather than a criminal justice approach.

Where a report has been made to the police, the DSL will consult the police and agree what information can be disclosed to staff and others,

including the alleged perpetrator(s) and their parents or carers. The DSL will also discuss with the police the best way to protect the child and their anonymity.

At this stage, BEP Academy will generally inform parents or carers unless there are compelling reasons not to, for example if doing so is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that BEP Academy supports the child in any decision they take. This will be done with the support of local authority children's social care and any appropriate specialist agencies.

BEP Academy will not wait for the outcome of a police investigation before protecting the child, alleged perpetrator(s) and other children. The DSL will work closely with the police to ensure any actions taken by BEP Academy do not jeopardize the police investigation.

All concerns, discussions, decisions and their rationale will be clearly recorded in writing.

#### **3.9.13. Considering bail conditions**

The police will consider what action to take to manage the assessed risk of harm, which may include police bail with conditions or release under investigation (RUI). BEP Academy will consider what additional measures may be necessary to manage any assessed risk of harm within the school.

Particular regard will be given to:

- a. The additional stress and trauma that might be caused to a child within the school
- b. The potential for the suspected person to intimidate the child or a witness
- c. The need to ensure risk management measures balance the management of risk with the rights of an unconvicted person

The DSL will liaise carefully with police investigators to develop a balanced set of arrangements.

#### **3.9.14. Managing any delays in the criminal process**

There may be delays in cases progressing through the criminal justice system. BEP Academy will not wait for the outcome of a police investigation before protecting the child, alleged perpetrator(s) and other children. The risk and needs assessment will inform any decisions taken during this period.

The DSL will work closely with the police and other agencies to ensure any actions taken by BEP Academy do not jeopardize the police investigation. If BEP Academy has questions about the investigation, the DSL will raise these directly with the police.

#### **3.9.15. The end of the criminal process**

If a child is convicted or cautioned for a sexual offence, BEP Academy will update its risk and needs assessment, ensure relevant protections are in place for all children and consider any suitable action in line with

the behaviour policy. If the perpetrator remains at BEP Academy alongside the child, BEP Academy will be clear about its expectations regarding the perpetrator's behaviour and any restrictions considered reasonable and proportionate.

If a case results in no further action, a not guilty verdict, or an allegation is withdrawn, BEP Academy will continue supporting both the child and the alleged perpetrator(s) for as long as necessary. The fact that an allegation cannot be substantiated does not necessarily mean it was unfounded. The DSL will discuss any decisions with the child in this light and continue to offer support to all parties.

**3.10. Unsubstantiated, unfounded, false or malicious reports**

- 3.10.1. 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.
- 3.10.2. 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.
- 3.10.3. 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 BEP Academy behaviour policy).

**3.11. Ongoing response, Safeguarding and supporting the victim and Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour (HSB)**

- 3.11.1. 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.
- 3.11.2. 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.

- 3.11.3. 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.
- 3.11.4. 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.
- 3.11.5. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.
- 3.11.6. 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.
- 3.11.7. 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
- 3.11.8. **Sanctions and the alleged perpetrator(s)**
  - a. 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.
  - b. 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.
  - c. 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.
  - d. 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.
- 3.11.9. **Discipline and support**
  - a. 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.

- b. 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.

#### 3.11.10. **Working with parents and carers**

- a. 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).
- b. 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.
- c. 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.
- d. 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.
- e. 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.
- f. 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.

#### 3.12. **Safeguarding other children**

- 3.12.1. 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".
- 3.12.2. 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.

- 3.12.3. 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.
- 3.12.4. 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.
- 3.12.5. 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.
- 3.12.6. 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.

## 4. Safer Recruitment

### 4.1. Policy

- 4.1.1. BEP Academy 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.
- 4.1.2. 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.
- 4.1.3. 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.
- 4.1.4. 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 7<sup>th</sup> edition (2025).

### 4.2. Safer Recruitment Procedure

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

#### 4.2.1. 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.

#### 4.2.2. 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.

#### 4.2.3. 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 a search (via an online search engine) as part of due diligence (applicants will be informed that these checks will take place)
- f. The candidate will be asked to clarify any highlighted discrepancies.

#### 4.2.4. **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.

#### 4.2.5. **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. Check a teacher's record (via [GOV.UK](https://www.gov.uk)) to verify any award of qualified teacher status (QTS) and the completion of teacher induction or probation, and to confirm the person is not subject to a prohibition order issued by the Secretary of State
- e. Where applicable, a section 128 check for management positions should be carried out using [GOV.UK](https://www.gov.uk).)
- f. Proof of a right to work in the UK

#### 4.2.6. **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.

- 4.2.7. 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

#### 4.3. **Safer Recruitment Responsibilities**

##### 4.3.1. 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

##### 4.3.2. 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

#### 4.4. **DBS Disclosure Checks**

4.4.1. BEP Academy 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.

4.4.2. 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 Disclosure and Barring Service (DBS).

4.4.3. 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), data protection laws (Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025) and the DBS code of Practice, also the ISA Vetting and Barring Scheme requirements.

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

4.4.5. 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

4.4.6. 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

4.4.7. 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.

4.4.8. 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.

#### 4.5. **Security of Information**

4.5.1. In compliance with the DBS Code of Practice and data protection laws (Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025) all Disclosure information and records of all personnel will be safely handled, securely stored, retained and disposed of in a secure manner.

4.5.2. BEP Academy have in place the Single Central Record, which records the receipt of all satisfactory DBS Disclosures.

## 5. Restrictive Interventions

### 5.1. Policy

- 5.1.1. BEP Academy 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 receiving education at the school, whether during a teaching session or otherwise.
- 5.1.2. 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.
- 5.1.3. To be judged lawful, the force used would need to be in proportion to the consequences it is intended to prevent.
- 5.1.4. The degree of force used should be the minimum needed for the least amount of time needed to achieve the desired result. Use of force should not be justified to prevent trivial misbehaviour'. (Department for Education — Restrictive interventions, including use of reasonable force in schools)
- 5.1.5. BEP Academy 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 staff.
  - c. An effective staff development programme that develops the skills of positive behaviour management.
  - d. Staff trained to identify 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.
- 5.1.6. All staff whose job involves supervising students and vulnerable adults may use reasonable force to restrain a student only when necessary.
- 5.1.7. When using reasonable force in response to risks presented by incidents involving students with SEND, mental health problems or medical conditions, staff recognise the additional vulnerability of these groups and consider their duties under the Equality Act 2010. Individual behaviour plans should be drawn up for more vulnerable students and agreed with parents, to reduce the occurrence of challenging behaviour and the need to use reasonable force.

## 5.2. Staff training

- 5.2.1. Not all staff are required to undertake formal restraint training. Staff who are likely to need to use reasonable force and/or other restrictive interventions will be adequately trained in its safe and lawful use and in preventative and de-escalation strategies.

Training will reflect the principles of the statutory guidance Restrictive Interventions, Including Use of Reasonable Force in Schools (April 2026) and will equip staff to:

- a. judge when it is appropriate to use restrictive interventions, including in situations where quick decisions are needed
- b. assess whether their response is reasonable under pressure
- c. use preventative and de-escalation strategies to minimise the need for restrictive interventions

BEP Academy will carry out risk assessments for staff who regularly work alongside children where the use of reasonable force or other restrictive interventions may be required. Staff who use restrictive interventions will be supported in their decision making. School leaders will determine the level and format of training required based on the needs of the school.

## 5.3. Deciding whether to use force

- 5.3.1. The use of force and what force to use must always depend on the circumstances of each incident.
- 5.3.2. We acknowledge that when faced with an incident there is very little time for staff to think before making a quick but effective decision.
- 5.3.3. Staff will 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.
- 5.3.4. Types of Incidents

Staff will have to make decisions when dealing with any of the following incidents:

- a. **Fighting** - students 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.

5.3.5. 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.

5.3.6. Staff may use the following types of force:

- a. **passive physical contact** by standing between students 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.

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

5.3.8. Risk assessments are in place for individual Students and vulnerable adults

5.3.9. 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.

#### 5.4. **Restraint**

5.4.1. Restraint is a non-disciplinary intervention which immobilises a child or limits their movement. It may or may not include direct physical contact. For example, holding a child's arms to their sides or removing a child's crutches would both be considered forms of restraint.

5.4.2. BEP Academy will only use restraint as a last resort where other strategies have been considered and are unlikely to be effective, and where failure to intervene would result in harm to the child or others.

5.4.3. Where restraint is used, it will be proportionate and the least restrictive option available. It will be applied for the least amount of time necessary to reduce the risk.

5.4.4. BEP Academy will not restrain a child in a way that affects their airway, breathing or circulation, for example by covering the mouth or nose, or applying pressure to the neck or abdomen. If a child is unintentionally held on the ground, staff must release their holds or reposition into a safer alternative or standing position as quickly as possible.

5.4.5. BEP Academy will not use restraint on a child for the purpose of punishment.

5.4.6. Where appropriate, the child will receive a medical assessment and treatment for any injuries as soon as possible. For any form of restraint, including seated and standing, BEP Academy recognises there is a risk of physical and psychological harm and it will be avoided where possible.

- 5.4.7. All incidents of restraint will be recorded and reported in accordance with sections 5.6 and 5.7 of this policy and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.

## 5.5. **Seclusion**

- 5.5.1. Seclusion is a non-disciplinary intervention involving keeping a child confined to a place away from others and prevented from leaving, either by physical obstruction, blocking, or making them believe they will be punished if they try to leave.
- 5.5.2. BEP Academy does not use seclusion as a behaviour management or disciplinary tool. Seclusion is distinct from removal from the classroom, which is a disciplinary measure addressed in the Student Behaviour Policy.
- 5.5.3. In exceptional circumstances, where a child is experiencing high levels of emotional or behavioural dysregulation and poses a risk of harm to others, BEP Academy may use a time-limited period of separation in a safe, supervised space as a safety measure. In such circumstances the child is not acting with intent and the intervention is not imposed as a punishment.
- 5.5.4. Where such a safety measure is used, BEP Academy will ensure:
  - a. The space is safe and does not feel threatening or intimidating to the child
  - b. The child is supervised at all times
  - c. As soon as the immediate risk of harm has reduced, the child is allowed to leave
  - d. The intervention is not implemented through threat of punishment
- 5.5.5. Any incident meeting the definition of seclusion will be recorded and reported in accordance with sections 5.6 and 5.7 of this policy and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025.

## 5.6. **Recording**

- 5.6.1. BEP Academy has a statutory duty under section 93A of the Education and Inspections Act 2006 and the Schools (Recording and Reporting of Seclusion and Restraint) (No. 2) (England) Regulations 2025 to record all significant incidents involving the use of force, restraint or seclusion.
- 5.6.2. All incidents will be recorded in writing as soon as practicable after the event.
- 5.6.3. The requirement to record applies even where the use of restrictive interventions has been agreed with parents as part of a child's behaviour support plan.

- 5.6.4. For each significant use of force, BEP Academy will record as a minimum:
- a. Names of the child and staff directly involved
  - b. Any relevant needs or circumstances of the child, including whether the child has an identified SEND and their SEN status code
  - c. Time, date, location and approximate duration of the intervention
  - d. Brief account of the incident, including what led up to it, any identified triggers, preventative or de-escalation strategies used, the type and degree of force applied and details of any physical injuries sustained
  - e. Brief account of why the use of force was assessed as necessary
  - f. Any post-incident support provided, including medical treatment
- 5.6.5. For each incident of restraint or seclusion, BEP Academy will record as a minimum:
- a. Names of the child and staff directly involved
  - b. Time, date, location and approximate duration of the intervention
  - c. Any relevant needs or circumstances of the child, including SEND and SEN status code
  - d. Brief account of why the intervention was assessed as necessary
  - e. Details of any physical injuries sustained
  - f. Any post-incident support provided, including medical treatment
- 5.6.6. Where a restraint incident also constitutes a significant use of force, BEP Academy will follow the recording procedure for significant use of force incidents under section 93A. The same information will not be recorded twice. Where a restraint incident does not constitute a significant use of force, for example removal of a mobility aid, it will be recorded under the seclusion and restraint procedure.

## 5.7. **Reporting**

- 5.7.1. BEP Academy will report all significant uses of force and all incidents of restraint or seclusion to parents or carers as soon as practicable after the incident and no later than the same day.
- 5.7.2. Exceptions to the requirement to report to parents are where:
- a. It appears to the staff member that doing so would be likely to result in serious harm to the child. In this instance BEP Academy will report the incident to any parent to whom it can be reported without resulting in serious harm or, if there are none, to the local authority within whose area the child is ordinarily resident.
- 5.7.3. The requirement to report applies even where the use of restrictive interventions has been agreed with parents as part of a child's behaviour support plan.

- 5.7.4. BEP Academy will communicate reports to parents in writing, for example by email or the school's online messaging system. Reports will include as a minimum:
  - a. Time, date, location and approximate duration of the intervention
  - b. Brief account of why the intervention was assessed as necessary
  - c. Brief account of the type of force applied and the degree of force
  - d. Details of any physical injuries sustained, if applicable
- 5.7.5. As best practice, BEP Academy will invite parents to a follow-up discussion where appropriate. This may include discussion of:
  - a. Behavioural triggers or warning signs
  - b. Whether any agreed behaviour support plans were followed
  - c. What de-escalation strategies were used and how effective they were
  - d. What might be done differently in future
- 5.7.6. Any information gathered through this process will be used to review and amend existing behaviour support plans as needed.
- 5.7.7. Any injuries will also be recorded in accordance with BEP Academy's health and safety procedures and reported to the Health and Safety Manager where required.

5.8. **Post-incident support**

- 5.8.1. 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
  - d. Emotional support to staff
  - e. Recording of the incident on the database.
  - f. Discussions with parents
- 5.8.2. All complaints and allegations will be dealt with by using the procedures as stated in the Complaints Policy.

5.9. **Corporal punishment**

- 5.9.1. 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.

## 6. Supervision of students

### 6.1. Policy

- 6.1.1. We have a legal duty of care to all our students and the responsibility to ensure that we have in place safeguarding procedures for supervising students throughout the school day to ensure their health, safety, welfare and good conduct.
- 6.1.2. We are aware that our responsibility of supervising students begins when they arrive at school. Therefore, we will ensure that all parents are informed of the time that school starts, and that students should at least 10 minutes before the time when school starts.
- 6.1.3. 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.
- 6.1.4. 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.

### 6.2. Responsibilities

- 6.2.1. The Board has:
  - a. a legal duty of care for all student and provided to provide adequate supervision 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
- 6.2.2. 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 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 during the school day
  - e. organise appropriate training for school staff
  - f. monitor the effectiveness of this policy
  - g. annually report to the Board.
- 6.2.3. Staff will:
  - a. be aware of and comply with this policy
  - b. maintain good order and discipline among all students 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

6.2.4. 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

6.3. **Supervision of breaks**

6.3.1. School staff will:

- a. be on duty 15 minutes prior to school begins
- b. ensure that all students enter the school building and go to their classes where their tutor and support staff will supervise them

6.3.2. 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 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 leaving during lunch breaks

6.3.3. Supervision during off-site visits

- a. The party leader will make all appropriate arrangements for supervision as outlined in the 'School Trips' policy

## **7. Children potentially at greater risk of harm**

### **7.1. Mental health**

- 7.1.1. Mental health is the concern of the whole community, and we recognise that schools play a key part in this.
- 7.1.2. BEP Academy 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.
- 7.1.3. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resilience.
- 7.1.4. 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.
- 7.1.5. It is recognised that young people who 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.
- 7.1.6. 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.
- 7.1.7. 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.
- 7.1.8. If a child discloses self-harm, or is found to be self-harming, the Designated Safeguarding Lead (DSL) or relevant key person will take the time to establish any underlying concerns.
- 7.1.9. The child will be supported to access services using the appropriate Local Authority help and support pathways.

### **7.2. Children requiring mental health support**

- 7.2.1. Schools have an important role to play in supporting the mental health and wellbeing of their pupils.
- 7.2.2. All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.
- 7.2.3. 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 or Family Help approach should be adopted.
- 7.2.4. Early identification of concerns and the use of Early Help or Family Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse.

- 7.2.5. We work in partnership with external agencies, including the Local Authority, Mental Health Support Teams (MHSTs) and CAMHS, to support children and their families.
- 7.2.6. BEP Academy has a mental health lead who supports the school to embed a whole-school approach to mental health and wellbeing.
- 7.2.7. Whilst staff are not expected to diagnose or treat mental health problems, they have an important role to play in: promoting good mental wellbeing and preventing the onset of mental illness; observing pupils and identifying early those who may be experiencing mental health problems or at risk of developing one; ensuring early targeted support is provided; and liaising with and referring to specialist services where needed.
- 7.2.8. Where support is needed, the DSL (or a deputy) should consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.
- 7.2.9. 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. It is key that staff are aware of how these experiences can impact on a child's mental health, behaviour, attendance and progress at school.
- 7.2.10. Staff can access additional mental health support and resources via the NHS Every Mind Matters website (<https://www.nhs.uk/every-mind-matters>) and the Hub of Hope mental health support database, which brings together local, national, community and NHS mental health support services in one place.

### 7.3. **Elective home education (EHE)**

- 7.3.1. Where a request is made to remove a child's name from the admissions register for the purpose of elective home education, BEP Academy will make the required return to the local authority. BEP Academy will ensure any safeguarding concerns are communicated to the local authority at this point, as children who are electively home educated may be less visible to the services that exist to keep them safe.

### 7.4. **Substance abuse**

- 7.4.1. This policy always applies on the school premises, as well as on offsite educational visits.

#### 7.4.2. 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.

#### 7.4.3. Policy principles

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.

- 7.4.4. 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.
- 7.4.5. BEP Academy is a no smoking environment and, in accordance with the law, no one student, staff, contractor or visitor may smoke in any part of the school.
- 7.4.6. 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'.
- 7.4.7. If a member of the school staff suspects that a student is abusing substances outside school, they must inform the Safeguarding Team.
- 7.4.8. Students known to be abusing substances should be referred (assuming they are compliant) to Drug Support services.
- 7.4.9. However individual exceptions may be made for students who require prescription medicines where appropriate (in accordance with the school's Policy on Medicines)
- 7.4.10. 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.
- 7.4.11. The Curriculum

The issue of substance abuse is specifically addressed through PD lessons where, in addition to form tutors, it is delivered by specialist agencies.
- 7.4.12. Dealing with Substance Abuse related incidents

Any medical emergencies should be dealt with via recourse to emergency services as a priority.
- 7.4.13. 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.
- 7.4.14. 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.
- 7.4.15. 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.

7.4.16. When it is suspected that substance abuse may have taken place out school (weekends or evening), staff must inform the Safeguarding Team.

7.4.17. 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.

## 7.5. **Young carers**

7.5.1. Schools should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing.

7.5.2. Early identification is essential to ensure young carers receive support at the right time and from appropriate services, including additional support from external partners or local authority and health services.

7.5.3. Staff should inform the Designated Safeguarding Lead if they become aware that a child has significant caring responsibilities, so that appropriate support can be identified and put in place.

## 7.6. **Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions**

7.6.1. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both on and offline. These can include:

- a. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- b. these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- c. the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- d. communication barriers and difficulties in overcoming these barriers
- e. risks that they do not understand that what is happening to them is abuse
- f. the need for intimate care or that these children are isolated from others
- g. that these children are more likely to be dependent on adults for care
- h. these children may have issues over cognitive understanding – being unable 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

7.6.2. Any reports of abuse involving children with SEND will therefore require close liaison with the DSL / DDSL team and the SENCO.

- 7.6.3. The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place in accordance with the following guidance:
- a. SEND Code of Practice 0 to 25 years, and
    - i. Supporting Pupils at School with Medical Conditions.
  - b. And from specialist organisations such as:
    - i. The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service ([councilfordisabledchildren.org.uk](http://councilfordisabledchildren.org.uk))
    - ii. Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
    - iii. NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

#### **7.7. Children who are lesbian, gay, bisexual**

- 7.7.1. A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. BEP Academy considers how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place

#### **7.8. Children who are questioning their gender**

- 7.8.1. The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and / or attention deficit hyperactivity disorder.
- 7.8.2. It is recommended that when families / carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help or advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- 7.8.3. As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to the Government guidance in relation to Gender Questioning Children, when deciding how to proceed.

- 7.8.4. BEP Academy will not initiate any action regarding social transition. This guidance applies where a child or their parent has raised a request. Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school in consultation with parents or carers.
- 7.8.5. Where a child requests support with social transition, the school will ensure that decision-making is documented and records are kept. The DSL will be involved in all such decisions. Parents and carers will be spoken to, as their views are of primary importance. In the rare circumstances where involving parents or carers would constitute a greater risk to the child, the DSL, in consultation with the wider safeguarding team, will determine what action is needed before parents are contacted or any decisions taken.
- 7.8.6. BEP Academy is legally required to record a child's biological sex accurately wherever it is recorded, and all relevant staff should be aware of a child's biological sex in all cases.
- 7.8.7. Where a child has fully socially transitioned and may be living in stealth, meaning school friends or staff may be unaware of their biological sex, the DSL will be involved. These children are likely to approach puberty in a fearful and anxious state and will need sensitive support. Where a child wishes to fully or partially reverse a previously agreed social transition, BEP Academy will work closely with parents and relevant experts to ensure the child is supported.
- 7.8.8. BEP Academy provides toilet facilities that meet the statutory requirements of the School Premises (England) Regulations 2012 and the Independent School Standards Regulations 2014. At the Romford site, gender-specific toilets and a unisex accessible toilet are available. At the Basildon site, an alternative unisex accessible toilet is available for students. Where a gender-questioning pupil requests alternative toilet arrangements, the DSL will discuss appropriate provision with the pupil and their parents/carers, taking into account the facilities available at that site.
- 7.8.9. BEP Academy will 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.

## **8. Student or vulnerable adult gone missing on or off site**

### **8.1. Policy**

- 8.1.1. 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.

### **8.2. Procedure**

- 8.2.1. If a student has gone missing on site:
- 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 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
- 8.2.2. When the student is found security procedures will be fully reviewed
- 8.2.3. All appropriate staff are trained in how to deal with a student going missing
- 8.2.4. Parents should:
- a. ensure they provide correct and updated contact details
  - b. be aware of security procedures especially at the beginning and end of the day

### **8.3. Reducing the Risk of a Missing Student / vulnerable adult**

- 8.3.1. All security procedures must be reviewed annually by the SMT. Everyday staff are 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

## 9. Critical Incident (Lockdown, Evacuation and Bomb threat)

### 9.1. Introduction

A 'Critical Incident' can be defined as:

- 9.1.1. 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.
- 9.1.2. 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.
- 9.1.3. 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.
- 9.1.4. 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.
- 9.1.5. This document sets out the procedures for dealing with the need to lockdown or evacuate the premises.

### 9.2. Lockdown – Two stages of lockdown – partial and full

- 9.2.1. 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
- 9.2.2. 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

### 9.3. Procedure for Partial Lockdown

- 9.3.1. This is where there is not an immediate threat inside school.
- 9.3.2. A verbal message will be given using the supplied radios:  
**"Secure, secure, secure"**
- 9.3.3. 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.

- 9.3.4. Close the windows and draw the blinds where fitted.
- 9.3.5. 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.
- 9.3.6. We would take advice from emergency services if it related to a local issue to make an ongoing dynamic risk assessment.

#### 9.4. **Procedure for Full Lockdown**

- 9.4.1. This is where there is an immediate threat inside the school grounds.
- 9.4.2. A verbal message will be given using the supplied radios:

##### **"Lockdown, Lockdown, Lockdown"**

- 9.4.3. All children return to their classrooms or go to the nearest building / classroom immediately.
- 9.4.4. All external doors will remain locked.
- 9.4.5. All internal doors need to be closed.
- 9.4.6. Windows must be shut, and blinds drawn.
- 9.4.7. Children and adults go under desks or out of view as soon as possible.
- 9.4.8. Staff to ensure their radio is working and tuned to the correct channel to allow emergency communication.
- 9.4.9. Staff not with a class must remain where they are and secure the room they are in.
- 9.4.10. A class in the garden (e.g. PE) must go inside immediately and follow instructions as above.
- 9.4.11. 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.

#### 9.5. **Evacuation**

- 9.5.1. 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

9.5.2. **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

9.6. **Bomb threat**

9.6.1. Being vigilant

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

9.6.2. 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 school 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 Principal or designated senior decision maker

9.6.3. **Contacting Police**

- a. The principal / designated senior decision maker along with the person receiving the bomb threat will call ‘999’

9.6.4. The following additional information will also be provided:

- a. A mobile contact number so the principal 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 Principal 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.

#### **9.7. Deciding to Evacuate**

- 9.7.1. The decision to evacuate a school is the responsibility of the Principal or designated senior decision maker.
- 9.7.2. 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.
- 9.7.3. In making the assessment the Principal 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)
- 9.7.4. As a rule of thumb consideration will be given to evacuating if there is a credible threat.
- 9.7.5. Consideration will be given to not evacuating if there is no credible threat.
- 9.7.6. 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.
- 9.7.7. Initial check - teachers to count the children prior to evacuation, taking into account children who are under the supervision of another member of staff.
- 9.7.8. 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.

#### **9.8. Police attendance and searching buildings**

- 9.8.1. 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.
- 9.8.2. In the event of a non-credible bomb threat police may attend to provide visible reassurance and enable face-to-face contact with the Principal. A search of the school premises by police will only be undertaken on the rare occasion it is considered necessary and proportionate.

9.9. **Post-Incident investigation**

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

## 10. Security

### 10.1. Policy

- 10.1.1. We believe it is essential to have in place security systems to protect students, 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.
- 10.1.2. Our principal aim is to ensure the personal safety of the whole centre community and to protect students, personnel, visitors, buildings, grounds and equipment from damage, arson and theft.
- 10.1.3. BEP Academy is aware of its obligations under the Terrorism (Protection of Premises) Act 2025 (Martyn's Law). Education settings are classified as standard tier under the Act. If either site reaches the threshold of 200 or more people reasonably expected to be present at any one time, BEP Academy will ensure that proportionate public protection procedures are in place to enable staff to act quickly to reduce harm in the event of a terrorist incident. BEP Academy will keep its premises under review against the threshold requirements.

### 10.2. Security Procedures

- 10.2.1. All security procedures will be reviewed annually by the SMT.
- 10.2.2. Each day school/centre staff will 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
- 10.2.3. Training will take place periodically for staff on all the above.

### 10.3. Security Responsibilities

- 10.3.1. 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
- 10.3.2. 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

10.3.3. All staff will:

- a. be aware of and abide by this policy
- b. undertake appropriate training in security procedures
- c. inform and remind students of security procedures such as the reporting of unidentified visitors who are on the site

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

10.3.5. 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

10.4. **Security Risk Assessments**

10.4.1. The security risk assessment will cover the following:

- a. Students 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

## 11. Visitors & Contractors

### 11.1. Policy

- 11.1.1. 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.
- 11.1.2. 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. Visitors and contractors will be asked to state the purpose of their visit, and their identity will be checked upon arrival.
- 11.1.3. 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.
- 11.1.4. 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.
- 11.1.5. BEP Academy will ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list)
- 11.1.6. Visitors in a professional capacity, such as educational psychologists, social workers or other education-related practitioners such as guest speakers, should confirm their ID and BEP Academy will ensure that they have received written confirmation that appropriate DBS checks have been carried out by their employer. Where the employer has obtained an enhanced DBS certificate, which has disclosed any matter or information, BEP Academy will ask to see the certificate. If there is no disclosure, then BEP Academy do not need to see a copy of the certificate. Visitors employed by local authorities are already pre-approved and BEP Academy do not need written confirmation from their employer.
- 11.1.7. DBS checks should not be requested for visitors attending in a personal capacity, such as children's family members or others attending school events. The principal should use professional judgement about whether such visitors require escort or supervision whilst on site.

### 11.2. Responsibilities

- 11.2.1. 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
- 11.2.2. 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

11.2.3. Staff will:

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

11.2.4. 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

11.2.5. 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
- e. never be in contact with students 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 always worn
- 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
- o. keep phones away in the designated schools areas when students are on school site

## **12. Student Illness**

### **12.1. Policy**

- 12.1.1. BEP Academy are committed to safeguarding and promoting the welfare of students and we expect everyone connected with this company to share this commitment.
- 12.1.2. We have a duty to ensure the health and wellbeing of all students in order for them to be successful learners in a learning environment that is clean, healthy and safe for everyone. We will deal with all students who become sick in a kind and caring manner.
- 12.1.3. If a student is displaying signs of illness then a parent/carers has a duty not to send their child to school. Likewise, staff will 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.
- 12.1.4. We are aware that all children are subject to coughs and colds at sometime and these should not prevent them from attending school. We 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.
- 12.1.5. BEP Academy works closely with parents/carers and we ensure that we have good lines of communication in place. To ensure the health and wellbeing of all students, everyone is aware of their role and responsibilities when a student is displaying signs of illness.
- 12.1.6. If a student is suffering from an infectious or contagious disease they should stay at home until they are fully recovered. We have a duty of care for all students and staff 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.

### **12.2. Responsibilities**

- 12.2.1. The Board has:
  - a. delegated powers and responsibilities to the Chief Executive to put into place procedures to ensure sick students are identified and are cared for appropriately
  - b. responsibility for the effective implementation, monitoring and evaluation of this policy
- 12.2.2. The Chief Executive will:
  - a. protect the health and safety of students and staff at all times
  - b. ensure procedures are in place and effectively implemented to deal with students 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 records and emergency contact numbers are kept up to date
  - f. monitor the effectiveness of this policy

12.2.3. 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

12.2.4. Staff will:

- a. notify the student's school or carer if their child is 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/carers to escort a student to hospital
- g. ensure records are kept of all students taken ill and sent home while at the school
- h. Be aware of those symptoms of severe allergic reaction (anaphylaxis) require immediate emergency response

12.2.5. 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

## 13. Administering Medicines

### 13.1. Policy

- 13.1.1. 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.
- 13.1.2. 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.
- 13.1.3. 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.
- 13.1.4. Non-prescription medicines will not normally be administered by staff. However, trained staff may administer emergency medication where necessary to preserve life or prevent serious harm, including adrenaline auto-injectors, in accordance with the school's Anaphylaxis Policy

### 13.2. Responsibilities

- 13.2.1. 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
- 13.2.2. 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
- 13.2.3. 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

### 13.3. Administration of Prescribed Medicines

- 13.3.1. 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/carers of this refusal

#### 13.4. **Medication Records**

13.4.1. The following information must be supplied by the parent/carers:

- a. Name and date of birth of the child
- b. Name and contact details of the parent/carers
- 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/carers for staff to administer medication
- h. Expiry date of medication
- i. Storage details

#### 13.5. **Administering Medicines Security**

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

#### 13.6. **Administering Medicines Educational Visits**

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

#### 13.7. **Administering Medicines Sporting Activities**

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

## **14. Supporting Pupils with Medical Conditions (Including Allergies and Anaphylaxis)**

### **14.1. Rationale**

- 14.1.1. BEP Academy recognises that pupils with medical conditions, including severe allergies, may be at increased risk of harm if appropriate procedures are not in place. Supporting pupils with medical conditions is therefore an important part of the school's safeguarding responsibilities.
- 14.1.2. A pupil having a medical condition, including allergies and conditions requiring delegated healthcare tasks, is not in itself an indicator that a child is at greater safeguarding risk.
- 14.1.3. In the event of a clinical incident taking place at school, the responsible healthcare professional, in conjunction with the DSL and DDSL team, will consider whether any safeguarding duty has been triggered and whether any further action is required based on the nature of the incident.
- 14.1.4. The school will take all reasonable steps to ensure that pupils with medical conditions can access education safely and are appropriately supported while in the care of the school.
- 14.1.5. Where a pupil has a diagnosed medical condition, including severe allergies, the school will work in partnership with parents/carers and relevant healthcare professionals to ensure appropriate support arrangements are in place.
- 14.1.6. Where necessary, an Individual Healthcare Plan (IHP) will be developed which will outline:
  - a. the pupil's medical condition
  - b. known triggers
  - c. required medication
  - d. emergency procedures
  - e. staff responsibilities
  - f. arrangements for school visits and off-site activities
- 14.1.7. Staff who work with pupils with identified medical needs will receive appropriate information and, where necessary, training to support them in carrying out their responsibilities.
- 14.1.8. Where a pupil is at risk of anaphylaxis, the school will ensure that appropriate emergency medication, including adrenaline auto-injectors, is accessible and that staff are aware of the procedures to follow in the event of a medical emergency.

### **14.2. Policy statement**

BEP Academy is committed to ensuring that pupils with medical conditions are properly supported so that they have full access to education.

### **14.3. Scope**

- 14.3.1. This policy applies to:
  - a. pupils with chronic conditions

- b. pupils requiring medication in school
- c. pupils with allergies or risk of anaphylaxis

14.4. Responsibilities

14.4.1. Proprietor / Governing body

- a. ensure policy implementation
- b. ensure staff training

14.4.2. Headteacher

- a. ensure procedures are followed
- b. ensure staff awareness of medical needs

14.4.3. Staff

- a. follow Individual Healthcare Plans
- b. administer medication where trained
- c. respond to emergencies

14.4.4. Parents

- a. provide medical information
- b. supply medication
- c. update the school about changes

14.5. Individual Healthcare Plans (IHPs)

14.5.1. IHPs may include:

- a. condition details
- b. medication
- c. triggers
- d. emergency response procedures
- e. contact information

14.5.2. IHPs are reviewed annually or following any medical change.

14.6. Managing medicines in school (this section should be read in conjunction with section 11 of the Health and Safety Policy)

14.6.1. The school will:

- a. store medication safely
- b. maintain medication records
- c. ensure expiry dates are monitored
- d. ensure medication accompanies pupils on trips

14.7. Staff training

14.7.1. Staff may receive training in:

- a. administering medication
- b. recognising allergic reactions
- c. responding to anaphylaxis

14.7.2. Training will be refreshed periodically.

14.8. Educational visits

14.8.1. Risk assessments will consider:

- a. medication access
- b. allergy risks
- c. emergency response planning

## **15. Online Safety**

### **15.1. Introduction and overview**

The purpose of this policy is to:

- 15.1.1. Set out the key principles expected of all members of BEP Group with respect to the use of IT-based technologies.
- 15.1.2. Safeguard and protect the children and staff.
- 15.1.3. 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.
- 15.1.4. 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 Academy community.
- 15.1.5. Have clear structures to deal with online abuse such as online bullying noting that these need to be cross referenced with other BEP Academy policies.
- 15.1.6. 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.
- 15.1.7. Minimise the risk of misplaced or malicious allegations made against adults who work with students.

### **15.2. Main area of risk**

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

#### **15.2.1. Content**

- a. Exposure to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny and misandry, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- b. Lifestyle websites promoting harmful behaviours
- c. Hate content
- d. Content validation: how to check authenticity and accuracy of online content

#### **15.2.2. Contact**

- a. Grooming (sexual exploitation, radicalisation etc.)
- b. Online bullying in all forms including being subjected to harmful online interaction with other users; for example: child to child pressure, commercial advertising and adults posing as children or young adults, or generative AI applications simulating this, with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- c. Social or commercial identity theft, including passwords

15.2.3. 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. Sending and receiving explicit images (e.g., consensual and non-consensual making or sharing of nudes or semi-nudes, including those generated using AI, sharing abusive images and online bullying)
- f. Copyright (little care or consideration for intellectual property and ownership)

15.2.4. Commerce

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

15.3. **Scope**

- 15.3.1. 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

15.4. **Roles and responsibilities**

- 15.4.1. 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. The Chief Executive will take lead responsibility for overseeing and acting on filtering and monitoring of systems including carrying out checks and reports.
- f. Filtering and monitoring systems will be reviewed for effectiveness at least once every academic year. Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.
- g. The CEO will communicate regularly with SMT and the designated online safety Governor/committee to discuss current issues, review incident logs and filtering/change control logs
- h. 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

- 15.4.2. The SMT will:

- a. Implement the policy
- b. Monitor the policy with the Designated 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. Use plan technology for your school - a service to help schools plan to use digital technology to keep children safe online, prevent cyber incidents and upgrade and maintain technology in cost-effective ways. Where required, complete self-assessments to get recommendations to help meet the digital and technology standards.  
Plan technology for your school - GOV.UK
- k. The school will use the DfE guidance Generative AI: product safety expectations to support its use of generative artificial intelligence safely, and how filtering and monitoring requirements apply to the use of generative AI in education
- l. 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.

15.4.3. 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. Be aware of procedures to be followed in the event of a serious online safety incident
- d. Promote an awareness and commitment to online safety throughout the BEP Group community
- e. 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
- f. Ensure that online safety education is embedded within the curriculum
- g. Liaise with BEP Group technical staff where appropriate
- h. To ensure that all staff are aware of the procedures that need to be followed in the event of an online safety incident
- i. To ensure that online safety incidents are logged as a safeguarding incident
- j. Facilitate training and advice for all staff
- k. Oversee any pupil surveys / pupil feedback on online safety issues
- l. Support BEP Group in encouraging parents and the wider community to become engaged in online safety activities
- m. Liaise with the Local Authority and relevant agencies
- n. Is regularly updated in online safety issues and legislation, and be aware of the potential for serious child protection concerns

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

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

15.4.5. The Network Manager / technician will:

- a. report online safety related issues that come to their attention, to the Designated Safeguarding lead
- 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/Designated 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

15.4.6. 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

15.4.7. 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.

15.5. **Communication**

15.5.1. 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

## 15.6. **Handling Incidents**

- 15.6.1. BEP Group will take all reasonable precautions to ensure online safety
- 15.6.2. Staff and pupils are given information about infringements in use and possible sanctions.
- 15.6.3. The Designated Safeguarding Lead acts as first point of contact for any incident
- 15.6.4. Any suspected online risk or infringement is reported to Designated Safeguarding Lead that day
- 15.6.5. 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)
- 15.6.6. Any suspected phishing and or financial scams, will be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

## 15.7. **Education and Curriculum**

- 15.7.1. BEP Academy:
  - 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 Academy 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 or DDSL team in the same way as any other form of harm, or risk of harm.
- 15.7.2. 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.

15.7.3. 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

15.7.4. 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?

## 15.8. **Staff training**

15.8.1. BEP Academy:

- 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.

## 15.9. **Parent awareness**

15.9.1. BEP Academy:

- 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

## 15.10. **Expected conduct and Incident management**

### 15.10.1. 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

### 15.10.2. 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

### 15.10.3. 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.

## 15.11. **Incident Management**

15.11.1. There is strict monitoring and application of the online safety policy and a differentiated and appropriate range of sanctions

15.11.2. 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

15.11.3. 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

15.11.4. Monitoring and reporting of online safety incidents takes place and contribute to developments in policy and practice in online safety within BEP Group

15.11.5. Parents/carers are specifically informed of online safety incidents involving young people for whom they are responsible

15.11.6. 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

- 15.11.7. We will immediately refer any suspected illegal material to the appropriate authorities

#### 15.12. **CCTV**

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

#### 15.13. **Digital images and video**

- 15.13.1. We gain parental/carers permission for use of digital photographs or video involving their child as part of the BEP Academy agreement form when their daughter/son joins BEP Academy (or annually)
- 15.13.2. We do not identify pupils in online photographic materials or include the full names of pupils in the credits of any published BEP Academy produced video materials/DVDs
- 15.13.3. Staff sign the BEP Academy'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
- 15.13.4. If specific student photos (not group photos) are used on the BEP Academy web site, in the prospectus or in other high profile publications the BEP Academy will obtain individual parental or student permission for its long-term, high-profile use
- 15.13.5. BEP Academy blocks/filter access to social networking sites unless there is a specific approved educational purpose
- 15.13.6. 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
- 15.13.7. 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.
- 15.13.8. 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

#### 15.14. **Remote Education**

- 15.14.1. BEP Academy communicates with parents and students on staying safe whilst participating in remote education (see Annex 5 for Parent/Carer communication).
- 15.14.2. 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.

15.14.3. We do not believe these formats pose additional safeguarding risks and can actually bring many benefits, including improved engagement. BEP Academy 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

#### 15.15. **Mobile Phones**

15.15.1. In accordance with KCSIE 2026, BEP Academy operates a mobile phone-free environment for pupils during the school day, including lessons, time between lessons, breaktimes and lunchtime. Expectations for both staff and pupils regarding mobile phone use are set out in the Staff Code of Conduct and the Student Behaviour Policy respectively.

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

- 16.1. The cohort of pupils in Alternative Provision often have complex needs, BEP Academy 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.
- 16.2. Where the school places a pupil with an alternative provision provider, we continue to remain responsible for the safeguarding of that pupil and will ensure that we are satisfied that the placement meets the pupils needs.
- 16.3. Including obtaining written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that the school would otherwise perform on their own staff). This includes written confirmation from the Alternative Provision that they will inform the school of any arrangements that may put the child at risk, so that the commissioning school can assure itself that appropriate safeguarding checks have been carried out on new staff working in alternative provision settings.
- 16.4. The school should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.
- 16.5. The department has published voluntary national standards for non-school alternative provision to support quality assurance of providers. However, BEP Academy remains ultimately responsible for the provision it commissions and will continue to carry out its own safeguarding checks and due diligence to ensure that provision is appropriate for each child's individual needs.
- 16.6. 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: Further Information**

### **1.1. Child abduction and community safety incidents**

- 1.1.1. 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.
- 1.1.2. 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.
- 1.1.3. Staff at BEP Academy will remain vigilant throughout the school day and patrol the areas immediately around the school.
- 1.1.4. If any suspicious behaviour is observed or people unknown to the school are seen, their presence must be reported to the Principal, Head of School or Designated Safeguarding Lead immediately.
- 1.1.5. The children affected should be asked to return to the school site, and the site secured.
- 1.1.6. 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.
- 1.1.7. If you believe there may be a wider threat to the occupants of the school site, the Critical Incident Policy/Procedure should be followed.

### **1.2. Children and the court system**

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

**1.3. Children who are absent from education**

- 1.3.1. 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.
- 1.3.2. All staff should be aware that children being absent from education for prolonged periods, unexplained and / or persistent absences can act as a vital warning sign of a range of safeguarding possibilities.
- 1.3.3. This may include abuse and neglect, which may include neglect, sexual abuse or exploitation and child criminal exploitation.
- 1.3.4. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage.
- 1.3.5. 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
- 1.3.6. 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.
- 1.3.7. Staff should be aware of the school unauthorised absence and children absent from education procedures.
- 1.3.8. The school holds at least two contact numbers for every child. These will be used as part of the First Day Calling process.

**1.4. Children with family members in prison**

- 1.4.1. 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.
- 1.4.2. Staff must inform the Designated Safeguarding Lead if they know a child has a family member in prison.
- 1.4.3. Further information can be found at <https://www.nicco.org.uk/>

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

- 1.5.1. Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.
- 1.5.2. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 1.5.3. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

**1.6. Child Sexual Exploitation (CSE)**

- 1.6.1. 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.
- 1.6.2. 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.
- 1.6.3. 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
- 1.6.4. CSE is a form of child sexual abuse.
- 1.6.5. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing.
- 1.6.6. 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.
- 1.6.7. 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. Financially Motivated Sexual Extortion (Sextortion) is a serious

form of blackmail that involves the exploitation of nudes or semi-nudes to coerce victims into unwanted actions such as sharing further explicit imagery or paying to prevent further sharing.

- 1.6.8. 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. This can be committed by an individual or an organised network and most sexual abuse is committed by individuals known to the victim. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- 1.6.9. Victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed and exploited without fully understanding the abuse they are experiencing.
- 1.6.10. 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
- 1.6.11. Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.
- 1.6.12. 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.

1.7. **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

- 1.7.1. 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.
- 1.7.2. Criminal exploitation can also include financial exploitation, where children are coerced or manipulated into activities for the financial benefit of others
- 1.7.3. 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.
- 1.7.4. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals, (particularly older children), and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.
- 1.7.5. 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.
- 1.7.6. **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.

#### **1.8. Modern Slavery and the National Referral Mechanism (NRM)**

- 1.8.1. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
- 1.8.2. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
- 1.8.3. The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.
- 1.8.4. 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.
- 1.8.5. 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 Local Authority must be made.
- 1.8.6. More information is available at <https://www.gov.uk/government/collections/modern-slavery>

#### **1.9. Cybercrime**

- 1.9.1. 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 crime continues to represent one of the most significant and rapidly evolving threats within the UK's crime landscape. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially. 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.
- 1.9.2. Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure.
- 1.9.3. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
- 1.9.4. If there are concerns about a child in this area, the designated safeguarding lead should consider referring into the Cyber Choices programme. Further information is available at the National Crime Agency website.
- 1.9.5. Cyber Choices information can be found at <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

#### **1.10. Domestic Abuse**

- 1.10.1. 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 - including physical, sexual, and emotional abuse, and stalking). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- 1.10.2. 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.
- 1.10.3. 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.
- 1.10.4. The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children.
- 1.10.5. 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.

- 1.10.6. Domestic abuse affecting young people can also occur within their personal relationships (sometimes known as teenage relationship abuse) or as child to parent or caregiver abuse, as well as in the context of their home life.
- 1.10.7. Staff must inform the Designated Safeguarding Lead if they have concerns about a child.
- 1.10.8. Operation Encompass
  - a. is an information-sharing scheme between the police and education settings operating in all police forces across England and Wales.
  - b. In November 2025, a new statutory duty was placed on the police to notify a child's education setting if they have reasonable grounds to believe a child may be a victim of domestic abuse.
  - c. This includes all children connected to a household where a domestic abuse incident has occurred, whether or not the child was physically present.
  - d. The DSL is responsible for leading on all Operation Encompass notifications and should ensure these are received, recorded securely and acted upon promptly in accordance with data protection laws.
  - e. Operation Encompass does not replace statutory safeguarding procedures or referrals.
  - f. Where appropriate, the police and/or school should make a referral to local authority children's social care if there are concerns about a child's welfare.
  - g. More details can be found here:  
<https://www.operationencompass.org/>

### **1.11. Serious Violence**

- 1.11.1. Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation.
- 1.11.2. BEP Academy staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict.
- 1.11.3. Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of or

involved in violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (for example suspensions, permanent exclusions, time in alternative provision) or a history of offending.

- 1.11.4. Staff should also be alert to when children might be at highest risk around the school day, for example immediately after school. If a member of staff becomes aware of a risk the DSL / DDSL or other senior member of staff (where not available) should be informed immediately.
- 1.11.5. Indicators that a child may be at risk from or involved with serious violent crime 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 wellbeing; signs of assault or unexplained injuries; and unexplained gifts or new possessions which could indicate association with criminal networks or gangs.
- 1.11.6. Early, evidence-based support for those considered at risk is vital. This includes access to trusted adults, social and emotional skills support and where available, targeted interventions such as mentoring or therapeutic support.
- 1.11.7. The DSL / DDSL will lead on referrals and liaising with appropriate agencies where serious violence concerns are identified.

## **1.12. Homelessness**

- 1.12.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- 1.12.2. 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.
- 1.12.3. There should always be a referral if a child has been harmed or is at risk of harm.
- 1.12.4. 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.
- 1.12.5. 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.
- 1.12.6. Staff must inform the Designated Safeguarding Lead if they have concerns about a child.

**1.13. So-called honour or faith-based abuse**

- 1.13.1. So-called honour or faith-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.

**1.14. Female Genital Mutilation (FGM):**

- 1.14.1. 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.
- 1.14.2. 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.
- 1.14.3. 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.
- 1.14.4. This will usually come from a disclosure.
- 1.14.5. Under no circumstances should BEP Group staff physically examine pupils.
- 1.14.6. 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.
- 1.14.7. 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.
- 1.14.8. 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.
- 1.14.9. Victims of FGM are likely to come from a community that is known to practise FGM.
- 1.14.10. 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.
- 1.14.11. 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

1.14.12. 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.

1.14.13. 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.

1.15. **Forced marriage**

- 1.15.1. A forced marriage is one that is entered into without the full consent of one or both parties.
- 1.15.2. It is where violence, threats or other forms of coercion is used and is a crime.
- 1.15.3. Any concerns should be reported to the DSL / DDSL team, followed up by submitting a report to the Safeguarding Hub
- 1.15.4. BEP Group follow the guidelines set out in The Right To Choose Government Guidance

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

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harm and abuse, protecting children from this risk is part of our schools safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**Terrorism** is an action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

- 1.16.1. BEP Group's duty under the counter terrorism and security act.
- 1.16.2. As part of the Counter Terrorism and Security Act 2015, BEP Group have a duty to 'prevent people being drawn into terrorism'.
- 1.16.3. This has become known as the 'Prevent Duty'.
- 1.16.4. 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.
- 1.16.5. 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.
- 1.16.6. 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.
- 1.16.7. 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.
- 1.16.8. 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.
- 1.16.9. 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.
- 1.16.10. 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

#### **1.17. Channel**

- 1.17.1. 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.
- 1.17.2. Prevent referrals are first assessed by police and 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. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police.
- 1.17.3. A representative from the school or college may be asked to attend the Channel panel to help with this assessment.
- 1.17.4. An individual will be required to provide their consent before any support delivered through the program is provided.

## Annex 2 - Disclosure

### 1. Dealing with disclosure

- 1.1. Stay calm and composed. Keep body language open and reassuring so the student feels safe continuing to speak.
- 1.2. 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.
- 1.3. If at this point, the young person decides not to 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
- 1.4. Inform the student that this will happen and never promise secrecy. Be upfront that the information may need to be shared with others in order to help — a promise of confidentiality is one you can't keep and shouldn't make.
- 1.5. Listen, don't interrogate. Let the student share what they want to say in their own time and their own words. Resist the urge to speed things along or interrupt. Never press the student for details.
- 1.6. Offer reassurance. Make clear the student was right to come forward, that they're not in trouble, and that whatever has happened is not their fault.
- 1.7. Don't lead the student. Avoid suggestive or leading questions (e.g., "Did they hit you?") that could put words in their mouth or shape their account. The acronym TED provides a simple and effective questioning framework that will keep questions open, neutral and student led:
  - a. Tell me.....
  - b. Explain.....
  - c. Describe.....
- 1.8. Don't play investigator. It isn't staff's role to question other students, confront the person named, or otherwise look into the claim — that's a job for the DSL and, where appropriate, external agencies.
- 1.9. Watch your reaction. Visible shock, anger, or other strong emotional reactions can make someone feel responsible, embarrassed, or frightened to say more.
- 1.10. Keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation
- 1.11. Be honest about what happens next. Explain that you'll need to pass the information on to keep them safe — but that it will only go to people who genuinely need to know.
- 1.12. Document carefully. If you need to jot anything down in the moment, keep it brief. As soon as possible afterwards, write a full, factual account using the

student's own words wherever you can (please see recording a disclosure).

- 1.13. Escalate without delay. Report straight to the school's Designated Safeguarding Lead (DSL) — this should happen immediately, not at the end of the day or when convenient.

## **2. Recording a disclosure**

- 2.1. Any records must be factual – do not include information if you are not sure if it's factual.
- 2.2. 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. The following areas should be covered where possible:
  - a. The student's name
  - b. Date, time and place of disclosure and who was present
  - c. The date, time and place of any incident and your factual observations
  - d. The nature of the suspected abuse
  - e. Factual observations including, marks, injuries, unusual behaviours (fill in body map form if appropriate)
  - f. What was said by the student
  - g. Whether any other person was involved
  - h. What was said to the student
  - i. What was said by any other person, e.g. parent, sibling, other child or young person, or colleague
  - j. The referrer's professional relationship to the family
  - k. Action taken at the time
  - l. Nature of discussion with manager
  - m. Subsequent action taken

## **3. Discuss IMMEDIATELY with the DSL or a Deputy DSL. *You must always pass on this information on the day of disclosure and before the end of the school day.***

## **Annex 3 – 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:

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

## Annex 4 - Online Safety Infringements

### How will infringements be handled?

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

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

| <b>STUDENT</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Category A infringements</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Possible Sanctions:</b>                                                                                                                                                                             |
| <ul style="list-style-type: none"> <li>• Use of non-educational sites during lessons</li> <li>• Unauthorised use of email</li> <li>• Unauthorised use of mobile phone (or other new technologies) in lessons e.g. to send texts to friends</li> <li>• Use of unauthorised instant messaging / social networking sites</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p><b>Refer to Key Worker</b></p> <p>Escalate to:<br/>Head of School</p>                                                                                                                               |
| <b>Category B infringements</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Possible Sanctions:</b>                                                                                                                                                                             |
| <ul style="list-style-type: none"> <li>• Continued use of non-educational sites during lessons after being warned</li> <li>• Continued unauthorised use of email after being warned</li> <li>• Continued unauthorised use of mobile phone (or other new technologies) after being warned</li> <li>• Continued use of unauthorised instant messaging / chatrooms, social networking sites, NewsGroups</li> <li>• Use of Filesharing software e.g. Napster, Vanbasco, BitTorrent, LiveWire, etc</li> <li>• Trying to buy items over online</li> <li>• Accidentally corrupting or destroying others' data without notifying a member of staff of it</li> <li>• Accidentally accessing offensive material and not logging off or notifying a member of staff of it</li> </ul> | <p><b>Head of School / Senior Manager / Safeguarding lead</b></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> |

| <b>STUDENT</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Category C infringements</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Possible Sanctions:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <ul style="list-style-type: none"> <li>Deliberately corrupting or destroying someone's data, violating privacy of others or posts inappropriate messages, videos or images on a social networking site.</li> <li>Sending an email or MSN message that is regarded as harassment or of a bullying nature (one-off)</li> <li>Trying to access offensive or pornographic material (one-off)</li> <li>Purchasing or ordering of items online</li> <li>Transmission of commercial or advertising material</li> </ul>                  | <p><b>Refer to Head of School / Online-Safety Coordinator / CEO / removal of Internet and/or Learning Platform access rights for a period</b></p> <p>Escalate to:<br/>contact with parents / removal of equipment</p> <p><b>Other safeguarding actions if inappropriate web material is accessed:</b><br/>Ensure appropriate technical support filters the site</p>                                                                                                          |
| <b>Category D infringements</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Possible Sanctions:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <ul style="list-style-type: none"> <li>Continued sending of emails or MSN messages regarded as harassment or of a bullying nature after being warned</li> <li>Deliberately creating accessing, downloading or disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent</li> <li>Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of <b>data protection laws</b></li> <li>Bringing the school name into disrepute</li> </ul> | <p><b>Refer to Head of School / Safeguarding Lead/ Deputy CEO/ Contact with parents</b></p> <p><b>Other possible safeguarding actions:</b></p> <ul style="list-style-type: none"> <li>Secure and preserve any evidence</li> <li>Inform the sender's e-mail service provider.</li> <li>Liaise with relevant service providers/ instigators of the offending material to remove</li> <li>Report to Police / CEOP where child abuse or illegal activity is suspected</li> </ul> |

| <b>STAFF</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Category A infringements (Misconduct)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Possible Sanctions:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"> <li>Excessive use of Internet for personal activities not related to professional development e.g. online shopping, personal email, instant messaging etc.</li> <li>Use of personal data storage media (e.g. USB memory sticks) without considering access and appropriateness of any files stored.</li> <li>Not implementing appropriate safeguarding procedures.</li> <li>Any behaviour on the World Wide Web that compromises the staff members professional standing in the school and community.</li> <li>Misuse of first level data security, e.g. wrongful use of passwords.</li> <li>Breaching copyright or license e.g. installing unlicensed software on network.</li> </ul> | <p><b>Referred to line manager / Deputy CEO</b></p> <p>Escalate to:</p> <p><i>Warning given</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Category B infringements (Gross Misconduct)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Possible Sanctions:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"> <li>Serious misuse of, or deliberate damage to, any BEP Group / Company computer hardware or software;</li> <li>Any deliberate attempt to breach data protection or computer security rules;</li> <li>Deliberately creating ,accessing, downloading and disseminating any material deemed offensive, obscene, defamatory, racist, homophobic or violent;</li> <li>Receipt or transmission of material that infringes the copyright of another person or infringes the conditions of Data Protection Laws;</li> <li>Bringing the school name into disrepute</li> </ul>                                                                                                                  | <p><b>Referred to CEO</b></p> <p><b>Other safeguarding actions:</b></p> <ul style="list-style-type: none"> <li>Remove the PC to a secure place to ensure that there is no further access to the PC or laptop.</li> <li>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</li> <li>Identify the precise details of the material.</li> </ul> <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.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 5 - Online safety – support for children**

[Childline](#) – For free and confidential advice

[UK Safer Internet Centre](#) – To report and remove harmful online content

[CEOP](#) – For advice on making a report about online abuse

[NCA CEOP – AI-generated child sexual abuse material](#) – guidance from CEOP Education and the Internet Watch Foundation on understanding and responding to AI-generated CSAM

[NCA CEOP – Financially motivated sexual extortion \(FMSE\)](#) – guidance for education settings on FMSE

### **Online safety- parental support**

[Childnet](#) – Offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support

[Commonsensemedia](#) – Provides independent reviews, age ratings, & other information about all types of media for children and their parents

[Government advice](#) – About protecting children from specific online harms such as child sexual abuse, sharing of self-generated intimate images, and cyberbullying

[Internet Matters](#) – Provides age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world

[How Can I Help My Child?](#) – Marie Collins Foundation – Sexual abuse online

[London Grid for Learning](#) – Provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

[Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) – Can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

[National Crime Agency/CEOP Thinkuknow](#) – Provides support for parents and carers to keep their children safe online

[Parentzone](#) – Provides help for parents and carers on how to keep their children safe online

[Talking to your child about online sexual harassment](#): A guide for parents – This is the Children's Commissioner's parental guide on talking to their children about online sexual harassment

[UK CMOs' guidance on screen time and social media](#) – advice from UK Chief Medical Officers