



Child Protection & Safeguarding Policy

Policy Status: Statutory

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1. Named Staff with Designated Responsibilities for Safeguarding

Academic Year	Designated Safeguarding lead (DSL) in Academies	Nominated Trustee	Local Authority Designated Officer (LADO)
2025-26	St John's School Shannon Poulter Shannon.pouter@bilftt.org Greys Primary Site Jo Tift jo.tift@bilftt.org Greys Secondary Site Chantelle Iorio chantelle.iorio@bilftt.org Grange Academy Angela Morris angela.morris@bilftt.org Rivertree School Katie Davis Katie.davis@bilftt.org	Trust Board James Hughes St John's School Andrea Maffei Greys School TBC Grange Academy Sarah Nichols-Weaver Rivertree Free School Matt Gibbs	Sandeep Mohan LADO@bedford.gov.uk 01234 276693

2. BILTT's commitment to Safeguarding

This policy sets out BILTT's commitment to safeguard and promote the welfare of all the children in our academies. We recognise that abuse, neglect and exploitation can and does happen anywhere, at any time and we are often the first to see the signs. We acknowledge and accept that, to protect the pupils in our care, we are individually and collectively responsible for acting promptly in response to these signs. We ensure that everyone is aware that abuse can occur both inside and outside the home and includes situations where pupils see, hear or experience the effects of domestic abuse and experience the impact of unexplainable and/or persistent absences from education.

BILTT recognises the need to secure robust safeguarding and child protection procedures that ensure that all staff, governors, parents, visitors and volunteers have clear direction regarding expected behaviour and understand their legal responsibilities to safeguard and promote the welfare of children across our schools.

To ensure this we:

- Create a culture where children can speak out and feel safe to share any concerns with staff.
- Ensure that all staff are trained to recognise their legal and ethical responsibility to safeguard pupils, identifying and reporting possible abuse.
- Develop and train staff to use a robust procedure that will be strictly followed.
- Implement systematic monitoring of pupils known or thought to be at risk of harm, and ensure the school effectively contributes to assessment and support for those pupils.
- Develop and promote effective working relationships and appropriate information sharing with other agencies, especially the police and relevant Social Care Team
- Reinforce this core policy with related and supporting policies.

- Keep the outcomes of our work under continuous review to ensure the best outcomes for pupils.
- Professionally challenge ourselves and other agencies to achieve the best outcomes.
- Ensure that all staff, Trustees, LGB members and volunteers who have access to pupils, have current DBS checks, their identity has been verified by original documentation and that those references are checked in line with BILTT recruitment policies/guidance.
- Provide a Designated Safeguarding Lead (DSL) who is a member of the leadership team and Deputy DSLs, all of whom undergo at least bi-annual training to provide them with the knowledge and skills required to carry out the role. In addition to their formal training, their knowledge and skills are updated at regular intervals throughout the year.
- Train all staff, volunteers and governors to at least Level 1 Safeguarding Awareness and PREVENT which will also form part of all new staff induction training.
- Provide a designated lead for mental health to oversee the provision and support of mental health and wellbeing in school and to ensure effective links exist with local mental health support agencies (See individual school websites for these details).
- Name a designated governor and trustee for safeguarding to support and challenge the school.
- Ensure that all children and their families are made aware of the Child Protection and Safeguarding Policy via email and the school website.
- Ensure that staff are clear how they can escalate issues within our school to ensure the response to a safeguarding issue is robustly addressed.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

The purpose of this policy is:

- To provide Trustees, LGB members, staff and volunteers with the overarching legal framework and principles that guide our approach to child protection and safeguarding.
- To outline the statutory responsibilities and the mechanisms for monitoring compliance in our schools.
- This policy applies to all staff, Trustees, LGB members, parents, carers, visitors and volunteers working in or on behalf of a BILTT Academies Trust School within BILTT, including those in the Central Team. For the rest of this policy the group will be referred to as 'staff'.

3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance

[Keeping children safe in education 2025](#)
[Working Together to Safeguard Children \(2023\)](#),
[Governance Handbook](#).

We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners. Please see Appendix E for further legislation.

4. Key Definitions

Safeguarding is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment **whether that is within or outside the home, including online**
- preventing impairment of children's **mental and physical** health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and

- taking action to enable all children to have the best outcomes.

Child Protection is defined as:

- the activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer from significant harm. This includes harm that occurs inside or outside the home, including online. (Working Together, DfE 2023).

Early help indicators

The Academy will be alert to any child who:

- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Has a parent or carer in custody, or is affected by parental offending
- Is frequently missing/goes missing from education, home or care

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix C explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix C defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children refers to everyone under the age of 18.

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

Three safeguarding partners work together to keep children safe:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

5. Equality statement

Some pupils may have an increased risk of abuse both online and offline. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social

exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all our pupils receive equal protection, we ensure that no child is discriminated against due to a protected characteristic (Equality Act 2010), training staff to be aware of unconscious bias. This means supporting via diverse methods such as interpreters, multilingual information, signing and visuals to ensure that they are heard and understood.

We give special consideration to pupils who are more vulnerable because they are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- gender questioning
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of a protected characteristic
- at risk of sexual exploitation
- not first language speakers of English
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- susceptible to radicalisation into terrorism
- looked after or previously looked after
- missing from education
- privately fostered
- Whose parent/carer has expressed an intention to remove them from school to be home educated

We are particularly aware of the fact that children who are (or who are perceived to be) lesbian, gay, bi, trans or gender questioning (LGBT+) can be targeted by other children and are proactive in preventing this through our Equaliteach work.

6. Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility.

Staff play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment reinforced through our RSHE curriculum. This includes teaching around:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Personal hygiene, body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support. Since February 2023, it's been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages

- What constitutes sexual harassment and sexual violence and why they're always unacceptable

All Staff, Governors, Trustees Volunteers

Everyone has a responsibility to:

- Be aware of the signs of abuse, neglect and exploitation including specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) and **always** act in the best interests of the child and young person.
- Know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe.
- Ensure that all safeguarding concerns are reported to the DSL as soon as reasonably possible (which must be on the same day they become aware).
- Recognise that their observation/concern may contribute to establishing a picture of risk and that all safeguarding concerns are relevant. The DSL may have other information regarding a child, young person or their family of which other staff may not be aware.
- Read and sign (on My Concern) to say they understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, at least annually.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Engage with training to equip them with a broad understanding of mental health needs appropriate to the age of the pupils in our school.
- Understand their expectations, roles and responsibilities around filtering and monitoring systems as explained to them in their annual Safeguarding training.
- Escalate concerns to the Headteacher or Chair of the LGB, where the individual who reported the concern does not believe all appropriate action has been taken

All staff will be trained to understand:

- What to do if a child tells them they are being abused, exploited or neglected. All staff will know how to manage the requirement to maintain an appropriate level of confidentiality.
- How to use our systems and policies which support safeguarding, know the role and identity of the designated safeguarding leads (DSL/DDSLs) and how to use My Concern.
- Early help assessment and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.

The Headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction

- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all staff low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring that the site is safe and compliant with law
- Ensuring that Safer recruitment is adhered to
- Ensuring that the CEO is updated on any significant safeguarding issues
- Ensuring that all DSLs/ DDSs have supervision which provides them with support, coaching and training, promotes the interests of children and allows for confidential discussions of sensitive issues.

Designated Safeguarding lead (DSL)

The DSL is a senior member of staff with the authority and seniority to carry out the functions of the role. The DSL cannot delegate this overall responsibility.

DSL Responsibilities

- Take the lead responsibility for child protection and safeguarding.
- Work with the safeguarding team to support other colleagues.
- Lead information sharing with other agencies.
- Develop policies.
- Ensure that all staff, volunteers and governors receive appropriate training.
- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings or support other staff to do so.
- Refer suspected cases, as appropriate, to the relevant body.
- Contribute to the assessment of children.
- Keep written records of all concerns, discussions and decisions, including the rationale for those decisions.
- Track trends and ensure timely support is put in place (both preventative and responsive).
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Be confident that they know what local specialist support is available (for both victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
- Take responsibility with the ICT Team for understanding the filtering and monitoring systems and processes in place, and ensures that all staff understand expectations, roles and responsibilities.
- Ensure that a child/young person's child protection file is copied for the new educational establishment within 5 days when a child or young person moves educational settings, and that this file is transferred securely and separately from the main pupil file.
- Keep the Headteacher informed of any issues.
- Fulfil the full responsibilities of the DSL set out in their job description.

Local Governing Body

All Governing Body members must recognise their safeguarding duties towards children and young people in the school. LGB Members are required to sign a code of conduct confirming this upon joining the LGB and this is renewed annually.

The Headteacher will present a termly safeguarding report to show evidence that the school is compliant with KCSIE 2025 and the policy is upheld.

The LGB must:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- Reviewing, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Ensure that:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Safeguarding Trustee

The Safeguarding Trustee (ST) has responsibility for ensuring that the Trustees are kept informed of safeguarding matters across the Trust. A report will be provided to the LGB by each DSL on a termly basis and the Trust Board will consider the BILTT's Trust report and the Trust's summary report in the school's annual Deep Dive.

7. Confidentiality

- Timely information sharing is essential to effective safeguarding.
- Confidentiality is respected as far as possible but the child/young person's welfare is paramount. This means some information must be shared. Staff should never promise a child that they will keep a secret, as this may not be in the child's best interests. They should make clear that they will only share with those who can help and need to know.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment: the DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- All staff are clear as to whether and what information they can share with colleagues and/or partners including information about parents.
- Access to information should be on a need-to-know basis and decided case by case by the DSL/ DDSs.
- Disciplinary action will be considered for any breach of confidentiality.

When sharing information, the DSL should consider that:

- The child's welfare is always paramount
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care and if appropriate 999.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or DDSL)

8. Recognising Abuse and Taking Action

Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse or neglect a child or young person by inflicting harm, or by failing to act to prevent harm. Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child. The risk may be within their environment and may relate to extra familial risks.

Reporting Systems for pupils:

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we:

- Put systems in place for pupils to confidently report abuse which reflect their diverse needs and communication methods.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Ensure that pupils choose a 'named person' who they can approach if they need to.

If staff have a concern about a child / young person's wellbeing, based on:

- Something the child / young person / parent or carer says
- Something you have noticed about the child/young person's behaviour, health, or appearance
- Something another professional said or did

You must report it using My Concern. It is never your decision alone how to respond to concerns, but it is always your responsibility to share concerns, no matter how small. If it is an emergency or the child is in immediate danger, you should tell the DSL/ DDSL and Headteacher. If you cannot do so, call 999.

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Use the child's chosen communication system which is meaningful to them e.g. signs, symbols, verbal language.
- Use the TED model by asking them clarify using the words, 'Tell, Explain, Describe', being careful to use open questions, beginning with words like: 'how', 'why', 'where', 'when', 'who'?

- Stay calm and do not show that you are shocked or upset, this may make them feel at fault.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner, reassure the child.
- Explain what will happen next and that you will have to pass this information on to help keep them safe. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Log on My Concern.
- If it is urgent, also speak to the DSL or DDSL. In an emergency if you feel a child is at immediate risk and cannot contact a DSL, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

How to make a record on My Concern

All staff are trained to use the system as part of their induction. If you need a refresher, please speak to the DSL/ DDSLs.

Logging must happen as soon as possible after the event but at least on the same day, noting:

- Name of child/young person
- Date, time and place
- Who else was present
- What was said / What happened / What did you notice speech, behaviour, mood, drawings, games or appearance
- Be factual, do not offer your opinion
- Complete a body map if appropriate
- Record the words of the pupil or parent verbatim, rather than your interpretation
- Analysis of what you observed and why it is a cause for concern.
- Do not take photos of any injuries unless requested to do so by a DSL, police or medical professional
- Do not record on another person's behalf unless it is an emergency, in which case this must be clear in the log.
- Temporary supply staff have a paper form given on day 1 to give to the office or Headteacher. This will be scanned onto My Concern by the DSL/DDSL.

When the school has concerns about a child/young person, the Designated Safeguarding Lead or Deputy will decide what steps should be taken in accordance with [Threshold of Need: Guidance for Effective Support for Children& Families in Bedford](#). The Head Teacher will be kept apprised of cases as appropriate.

Where there is a safeguarding concern, we ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Members of the safeguarding team always seek the child's view in the way that best suits their SEND need and record this on my concern remembering that the child's best interests are paramount.

Referrals

The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise, record and refer if appropriate.

Referrals are made by the DSL/ DDSL unless it is an emergency and you cannot contact these staff in which case you must do it, and let the DSL/ DDSL know as soon as possible.

- If it is appropriate to refer the case to local authority children's social care or the police, the DSL/DDSL will make the referral using the Bedford Borough Portal to the Integrated Front Door (IFD) <https://ilchildandfamilies.bedford.gov.uk/> or by calling 01234 718700
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- The DSL/DDSL will inform parents/ carers that they are making a referral. IFD may suggest delaying informing the parent in cases of suspected sexual abuse, or where informing the parent might put the child or young person at further risk, to prevent them being harmed or intimidated (and retracting their disclosure). In cases of suspected Fabricated or Induced Illness by proxy, the parent is not informed that this is being considered

If a child protection investigation is pursued, the DSL and other key school staff will:

- Work closely and collaboratively with all professionals involved in the investigation, to keep the child / young person safe
- Attend any strategy meetings/discussions in relation to the child
- Attend a child protection conference when invited and provide updated information about the child/young person
- Attend any subsequent child protection review conferences
- Attend core group meetings and take an active role in the implementation of the protection plan

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

The escalation forms and procedures can be located at [Escalation Procedures](#) the completed form should be sent to Bedford Borough Safeguarding Children Partnership.

Early help assessment

Early Help is defined as 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.'

- If an early help assessment is appropriate, the DSL/DDSL will complete this with the family, in some cases acting as the lead practitioner.
- The DSL will keep the case under constant review and the school will consider a referral to the local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

How to manage specific concerns:

Please see Appendix D for indicators of specific concerns

8.1 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises, "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- Suspect that an act of FGM is likely to be carried out

must immediately report this to the police, **personally**. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

8.2 If you have concerns that a child is susceptible to radicalization into terrorism.

Please also refer to the PREVENT policy

- Speak to the DSL and report your concern on My Concern. If in exceptional circumstances and the child is in immediate danger the DSL is not available, you should refer yourself or call 999.
- Where there is a concern, the DSL will consider the level of risk and if necessary make a referral to preventreferrals@beds.police.uk using the National Prevent Referral Form which can be found in the Prevent policy. More information can be found here: [Making a referral to Prevent - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/making-a-referral-to-prevent)
- The Department for Education also has a dedicated reporting website, which school staff and governors can use to raise concerns about extremism with respect to a pupil. [Report Extremism in Education - Start](https://www.gov.uk/guidance/report-extremism-in-education-start)
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - Think someone is in immediate danger
 - Think someone may be planning to travel to join an extremist group
 - See or hear something that may be terrorist-related

8.3 If you have a concern around a child's mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff must be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern please report using My Concern in the usual way.

Please refer to the Department for Education guidance on [mental health and behaviour in schools](https://www.gov.uk/guidance/mental-health-and-behaviour-in-schools) for more information.

8.4. Pupils with special educational needs, disabilities and health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are three times more likely to be abused than their peers.

We will be aware and have strategies to overcome additional barriers that can exist when recognising abuse, neglect and exploitation in this group, including:

- Avoiding assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's SEND need without further exploration
- Avoiding assumptions that pupils are more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.

8.5. Children looked-after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads
- Staff have a sound knowledge of ACES (adverse childhood experiences) and their impact.

We have appointed a designated teacher in each Academy who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL and Safeguarding Team to ensure that any are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

8.6. Children who have a social worker (Child in Need and Child Protection Plans)

- Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- The DSL and all members of staff will work with and support social workers to help protect vulnerable children, ensuring that they are kept updated and included in any decision making.

9. School Attendance and Children Absent from and Missing Education

Our school and the Local Governing Board will routinely monitor attendance and patterns of attendance, with those responsible taking positive and immediate action to address and resolve concerns, in line with school policy.

All staff are aware that children low attendance can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems,

risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Staff must be aware of our school's Attendance Policy and children absent from and missing from education procedures. This includes children being absent within the school day. Supporting children who are absent from education helps prevent the risk of them becoming a child missing education in the future. If the school are concerned the DSL/ DDSL will report a child missing using the form [Child missing education/possible missing children | Bedford Borough Council](#)

Our school ensures that parents /carers provide at least two emergency contact numbers and these details are updated as required and at least annually. Any pupils who are absent without a reason given will be contacted by office staff as per our attendance policy.

If parents or carers express their intention to educate their child at home, known as 'elective home education', school will ensure the local authority are aware and work closely with the families.

10. Contextual Safeguarding

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside our school and/or can occur between children outside the school. All staff, but especially the designated safeguarding lead (and deputies) must consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

The Headteacher and DSL/ DDSL liaise closely with the local authority and police to be aware of community contextual safeguarding issues and take proactive action to address them.

11. Record Keeping and Reporting

- Anyone who has concerns about the welfare of a child or young person must share this information on the same day that they become aware with the DSL or Deputy DSL via My Concern.
- Logs of all conversations, actions and information shared will be logged on My Concern.
- Any historic records which are shared with the school are stored securely in the DSL's office and scanned electronically onto My Concern.
- The DSL or Deputy DSL will be notified of any child or young person where a fixed term or permanent exclusion is being considered as appropriate. This will also be logged on My Concern.

12. Allegations of child-on-child abuse

Please see the Child-on Child abuse policy

- We recognise that children are capable of abusing other children. Abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up', as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils
- Whilst we recognise the gendered nature of child-on-child abuse, we believe that all child-on-child abuse is unacceptable and will be taken seriously
- Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
 - Is serious, and potentially a criminal offence
 - Could put pupils in the school at risk
 - Is violent

- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Procedures for dealing with allegations of child-on-child abuse (please see child-on-child abuse policy)

It is essential that all staff understand the importance of challenging inappropriate behaviours. If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school gender questioning port as a potentially vulnerable place for a victim or alleged perpetrator(s).
- We will ensure that the victim, perpetrator and any other pupils impacted all have appropriate support from the school well-being team.
- If Harmful sexual behaviours are involved, support may utilise the Lucy Faithfull Foundation's tool kit [Home - Shore](#)
- The DSL/DDSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence and there are delays in the criminal process, the DSL/DDSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary and support measures against the alleged perpetrator. We will consider these matters on a case-by-case basis, taking into account whether an action would prejudice an investigation and/or subsequent prosecution: we will liaise with the police and/or LA children's social care to determine this.
- If a situation is severe enough it may warrant a permanent exclusion under our behaviour policy.

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders, (whilst recognising that all pupils may be at risk)– for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils can easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:

- Their important role in preventing child-on-child abuse and responding where they believe a child may be at risk
- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

13. Sharing of nudes and semi-nudes ('sexting')

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL/DDSL immediately via My Concern. Staff must also be aware of sextortion (where images are used to blackmail) and AI produced images and report any concerns.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help. The DSL/ DDSL will take the following actions:

a) Initial review meeting

Following a report of an incident, the DSL/DDSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual

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

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- 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)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

b) Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will speak with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL/DDSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded as per this policy.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

14. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. All our academies adhere to the guidance in [Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK](#) 2025;

We are proactive in addressing the key threats of:

- Cyberflashing
- Epilepsy trolling
- Threatening communication
- Encouraging self-harm and suicide
- Sharing intimate images

To address this, our school will:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- The Trust 'Firewall and Monitoring Solutions' is Smoothwall. The Firewall provides structured website access and blocking policies based on URL lists. Notifications are automatically sent to the applicable Safeguarding Team when website access is blocked during pupil use. The Monitoring solution provides both offline and online protection. Pupil device use is monitored by what is typed and/or accessed on the internet. A dedicated monitoring team at Smoothwall notify the Safeguarding Team by email and/or phone if there are any concerns. Both solutions work in tandem to provide digital safeguarding for pupils across the Trust.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- Content: being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, prejudice related, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism. This also includes exposure to a range of conspiracy theories.
- Contact: being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying. We acknowledge the dangers of misinformation (the inadvertent spread of false information with no intent to harm) and disinformation (the malicious and deliberate sharing of false information with the intent to harm).; and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above we will:

Educate pupils about online safety as part of our curriculum, including:

- The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
-
- Train staff, as part of their induction, on safe internet use, filtering and monitoring and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
 - Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
 - Ensure all pupils hand in their phones at the start of the day and sign the AUP
 - Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
 - Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
 - Explain the sanctions we will use if a pupil or staff member is in breach of our policies on the acceptable use of the internet and mobile phones
 - Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
 - Put in place robust filtering and monitoring systems along with risk associated reporting processes that meet the [DfE'S standards](#) to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems which includes: which includes:
 - Physical monitoring whilst pupils are using technology
 - Reporting and documenting processes in place for all staff to utilise concerning the use of technology and devices
 - 'Filtering and Monitoring Solutions' which will enable schools to identify and intervene with safeguarding issues associated with ICT device use. This includes Internet use/access and the use of applications both through keyed words and displayed data. We acknowledge that some children are at greater risk of harm than others, both **online and offline**.
 - Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

15. Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. At BILTT, we follow the guidance issued in June 2025 [Generative artificial intelligence \(AI\) in education - GOV.UK](#)

Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard. As a Trust we will provide training to ensure that we:

- Consider the risks and challenges, alongside the opportunities and benefits.

- Continue to work to ensure the safety and reliability of technology, including AI tools, to support teachers and learners.
- Address fundamental barriers such as connectivity.

BILTT recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

BILTT will treat any use of AI to access harmful content or bully pupils in line with this policy and our anti-bullying and behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy, which you can find on our website.

16. Allegations and concerns about a staff member, supply teacher, volunteer or contractor

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the pupil is paramount.

Allegations may be that an adult in school has:

- behaved in a way that has harmed a child or young person or may have harmed a child or young person.
- possibly committed a criminal offence against or related to a child or young person; or
- behaved towards a child or young person or children in a way that indicates they may pose a risk of harm to children.

What to do:

- All allegations should be immediately brought to the attention of the Headteacher.
- If an allegation is made against the Headteacher, this should be brought to the attention of the Chair of Governors.
- Concerns must also be logged on the 'Low-Level Concerns' form found on SharePoint on the same day you become aware of the concern. If it is serious, you must also speak to the Headteacher.
- If a supply member of staff has a safeguarding concern, they must report it using the safeguarding form given to them at the start of their day.
- Where there is a report that a member of staff or volunteer has behaved inappropriately, the Headteacher will refer the case to the Local Authority Designated Officer LADO –Sandeep Mohan, Tel: 01234 276693 and the Chair of Trustees. Where the allegation concerns the Headteacher, the Chair of Trustees will liaise with the LADO.
- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the (LADO).
- If the school receives an allegation relating to an incident where an individual or organisation was using school premises for running an activity for children, we follow our safeguarding policies and procedures and inform the local authority designated officer (LADO), as we would with any safeguarding allegation (KCSIE paragraph 377).

All staff, governors and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and know that such concerns will be taken seriously by the senior leadership team. Staff must also follow the Whistle Blowing policy if they feel their concerns are not being responded to. They can also contact the LADO or police.

The Headteacher will take the following actions:

- Ensure that the child or young person reporting the allegation is safe and away from the member of staff, volunteer or governor against whom the allegation is made.
- Contact the LADO in Bedford Borough immediately.
- Contact the parents/carers of the child/young person following advice from the LADO.
- Following advice from the LADO and HR, review the member of staff's working arrangements, volunteer or governor role, and if no safe alternative identified suspend the member of staff, volunteer or governor pending the investigation.
- Attend joint evaluation meetings (JEMs) convened by the LADO and act upon the decisions made at these meetings.

Suspension should be considered when:

- There is a cause to suspect a child or young person is at risk of significant harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it might be grounds for dismissal.

Any disciplinary investigation should be carried out once the child protection investigation has been completed.

Low Level Concerns:

The term 'low level' concern refers to any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Sharing low level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy/code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records about staff concerns will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, a course of action will be decided on, either through the school's disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, the school will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low level concerns in references unless:

- The concern has met the threshold for referral to the LADO (Local Area designated officer) and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

18. Safer Recruitment

Keeping Children Safe in Education 2025 highlights Safer Recruitment processes in education settings. At least one member of our staff on every recruitment panel has undertaken training in Safer recruitment. Our recruitment and selection process ensures that staff, volunteers and governors have undertaken appropriate safeguarding checks including:

- Identity check.
- Enhanced Disclosure and Barring Service (DBS) checks.
- Staff barred list checks.
- Two references with at least one being from the previous employer.
- Online checks of social media accounts.
- A record of the interview is kept.
- Anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.
- Volunteers are appropriately supervised.

- Check of professional qualifications.
- Check to establish the person's right to work in the UK.
- Further checks on people who have lived or worked outside the UK.
- For agency and third-party supply staff written confirmation that the business supplying the staff has carried out relevant checks and obtained appropriate certificates.
- Our school follows advice in the Disqualification by Association under the Childcare Act 2006 (as amended).
- Our school carries out online searches for shortlisted candidates as part of due diligence in our recruitment process, (as per KCSIE, paragraph 220).

Safer Recruitment processes aim to:

- Deter potential abusers by setting high standards of practice and recruitment.
- Reject inappropriate candidates at the application and interview stages.
- Prevent abuse to children by developing robust policies and agreeing on safe practice.

The school has procedures in place to make a prompt DBS referral via the HR Team, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. **This is a legal duty.**

Volunteers who have not had checks undertaken are not left unsupervised or allowed to work in regulated activity.

18. Site Security

All staff have an electronic identity badge that is worn at all times. They are required to sign in/out during the course of the day.

Parents who are simply delivering or collecting their children do not need to sign in. Parents that are meeting with a member of staff should be signed in, this excludes parents' evenings when a designated member of staff is on the door.

All visitors are expected to observe the safeguarding and health and safety regulations to ensure children are kept safe. The Headteacher will exercise professional judgment in determining whether any visitor should be escorted or supervised while on site. All visitors are given a leaflet explaining the school's safeguarding expectations on their arrival. The Site Agent completes daily site checks for security of the site.

Checking the identity and suitability of visitors

- All visitors will be required to verify their identity to the satisfaction of staff.
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
- Visitors are expected to sign in via 'Entry sign' and wear a visitor's lanyard. If they have DBS they are given a green lanyard, if not it will be red. Contractors with DBS have a yellow lanyard. All staff and pupils are aware of this.
- Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:
 - Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
 - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)
- Children and young people should not be collected by people other than their parents/carers or regular transport unless written notification has been received in advance.

- Regular contractors who are carrying out work around the school building, unsupervised, should be subject to the same enhanced DBS checks as staff, volunteers and governors and the employing authority of the contractor should be prepared to make available employment checks on request (e.g. references).
- All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Occasional Events

Some events, for example winter productions or sports days, happen only rarely, but involve the movement of large numbers of pupils around the school at a time when parents and carers are also given access to the site. The Leadership Team are responsible for ensuring that a plan is written, detailing how and when pupils and other people will enter and exit their classrooms and the school site. The plan is shared with all staff and each individual is responsible for making sure that they read, understand and carry out the plan.

On some occasions, it may be more practical for families to take their children home from the event directly rather than waiting for the end of the school day or for the children to return to the classroom. The plan will also explain if parents are permitted to do this and how this will be done. This would include the expectation that teachers or designated support staff know which children have been taken home.

19. Late Collection of Children

Children that have not been collected by a parent/carer are brought to the main reception. A member of the office team or the class teacher will try to contact the parent/carer. If there is no response, they will try the other contact numbers. It is the responsibility of the parent/carers to keep the school office informed of all current telephone numbers and emergency contacts. After a reasonable time, should school be unsuccessful in contacting a parent/carer, social services will be contacted.

20. If a child is unaccounted for

The emergency procedure for a situation where a child has gone missing is as follows:

- Notify the school office immediately of the child's name, class and time/location of last sighting
- Office to alert Headteacher/Deputy as per the Lost Child Policy.
- Key personnel to search school site.
- If not found within the school building – SLT and available staff to sweep full grounds.
- If deemed necessary by SLT – designated staff to search local roads.
- Parents/carers and police to be notified if child not found on the school site within 10 minutes.

For details, please see the Lost Child Policy.

22. Extended School and Off-Site Arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own Child Protection and Safeguarding Policy and Procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.

If one of our school's receives an allegation relating to an incident where an individual or organisation was using our school premises for running an activity for children, we would follow our Safeguarding policies and procedures and inform the local authority designated officer, as we would with any safeguarding allegation.

When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place and there is appropriate liability cover in place.

Alternative Provision

On rare occasions pupils may attend a provision in an alternative provision. We recognise our continued responsibility for these pupils and will ensure that:

- We know where pupils are during school hours
- Have written information from the provider that appropriate safeguarding checks have been carried out on individuals working in their own establishment
- Carry out quality assurance visits
- Conduct at least half termly reviews of the setting to ensure that the placement remains safe and meets the child's needs
- Further guidance can be found [Alternative provision - GOV.UK](https://www.gov.uk/guidance/alternative-provision)

23. Curriculum: Supporting School Provision

We ensure safeguarding, including online safety, is taught as part of a broad and balanced curriculum.

Many other aspects of school provision support the aims of this policy. Our school plays an important role in making children and young people aware both of behaviour towards them that is not acceptable, and of how they can help keep themselves safe.

The framework for relationships, social and health education (RSHE) provides opportunities for children to learn about keeping safe. RSHE curriculum materials provide resources that enable our school to tackle issues regarding healthy relationships, including domestic violence, bullying and abuse. Discussions about personal safety and keeping safe reinforce the message that any kind of violence is unacceptable, let children know that it is acceptable to talk about their own problems, and signpost sources of help.

Other aspects of provision that support this policy are:

- Social and emotional aspects of learning.
- Citizenship curriculum.
- Sexual health initiatives.
- School nurse checks.

24. Use of Force, Restraint and Positive Handling

The law forbids a teacher or other members of staff from using any degree of physical contact that is deliberately intended to punish a pupil, or that is primarily intended to cause pain or injury or humiliation.

Teachers at a school are allowed to use reasonable force to control or restrain pupils under certain exceptional circumstances. In some circumstances, teachers and authorised members of staff can restrain pupils to protect them and others. Staff are PRICE trained to support them in fulfilling this role.

Any concerns or allegations that a member of staff, including supply staff, volunteer or governor may have acted inappropriately should be brought to the Headteacher immediately, in confidence. The Headteacher, in turn, will contact the Local Authority Designated Officer (LADO).

The current guidance is: *Use of reasonable force: Advice for Headteachers, staff and governing bodies*, July 2013. <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

25. Staff Conduct

To protect children and members of staff, we expect staff, volunteers and governors to follow our professional Code of Conduct. This covers appropriate dress, the use of appropriate boundaries, social contact outside the setting (including on social networking sites), the receiving and giving of gifts and favouritism, and the safe use of technology.

Consideration needs to be given to:

- Being alone with the child / young person
- Physical contact / restraint
- Social contact outside setting / appropriate boundaries
- Gifts and favouritism
- Behaviour management
- Intimate care
- Administration of medicine
- Safe use of technology (Security / Internet / mobile phones / digital images of children, etc.)
- Appropriate use of social networking sites

26. Implementation, Dissemination and Review Strategies

This policy is reviewed annually by the Headteacher and DSL and is considered and approved by the Board of Governors. It will reflect the experience and expertise of school staff, volunteers and governors. The DSL will encourage a culture of listening to children and young people and taking into account their wishes and feelings in any measures our school may put in place to protect them.

All members of staff, volunteers and governors read and agree the child protection policy before the start of their employment/volunteering/governor role and at the start of each year.

All children, young people and their families will be made aware of the policy before enrolment. It is important for families to be aware of actions staff may take if there are any concerns for a child or a young person's safety, and for them to understand that they might not be consulted before action is taken. Knowing about child protection procedures ahead of time helps parents to engage better in the process, meaning that change is more likely to take place.

27. Useful Contacts:

- Bedfordshire Police 01234 841212/101 In emergency dial 999
- Children Missing Education Officer (Debi Momi) – Tel: 01234 228178
- Integrated Front Door – Tel: 01234 718700 (office hours) or 0300 300 8123 (out of hours). Multi.Agency@bedford.gov.uk

- Local Authority Designated Officer (LADO) – Tel: 01234 276693 lado@bedford.gov.uk Sandeep.Mohan@bedford.gov.uk
- Bedford Borough Safeguarding Children Partnership lscb@bedford.gov.uk Tel: 01234 276512

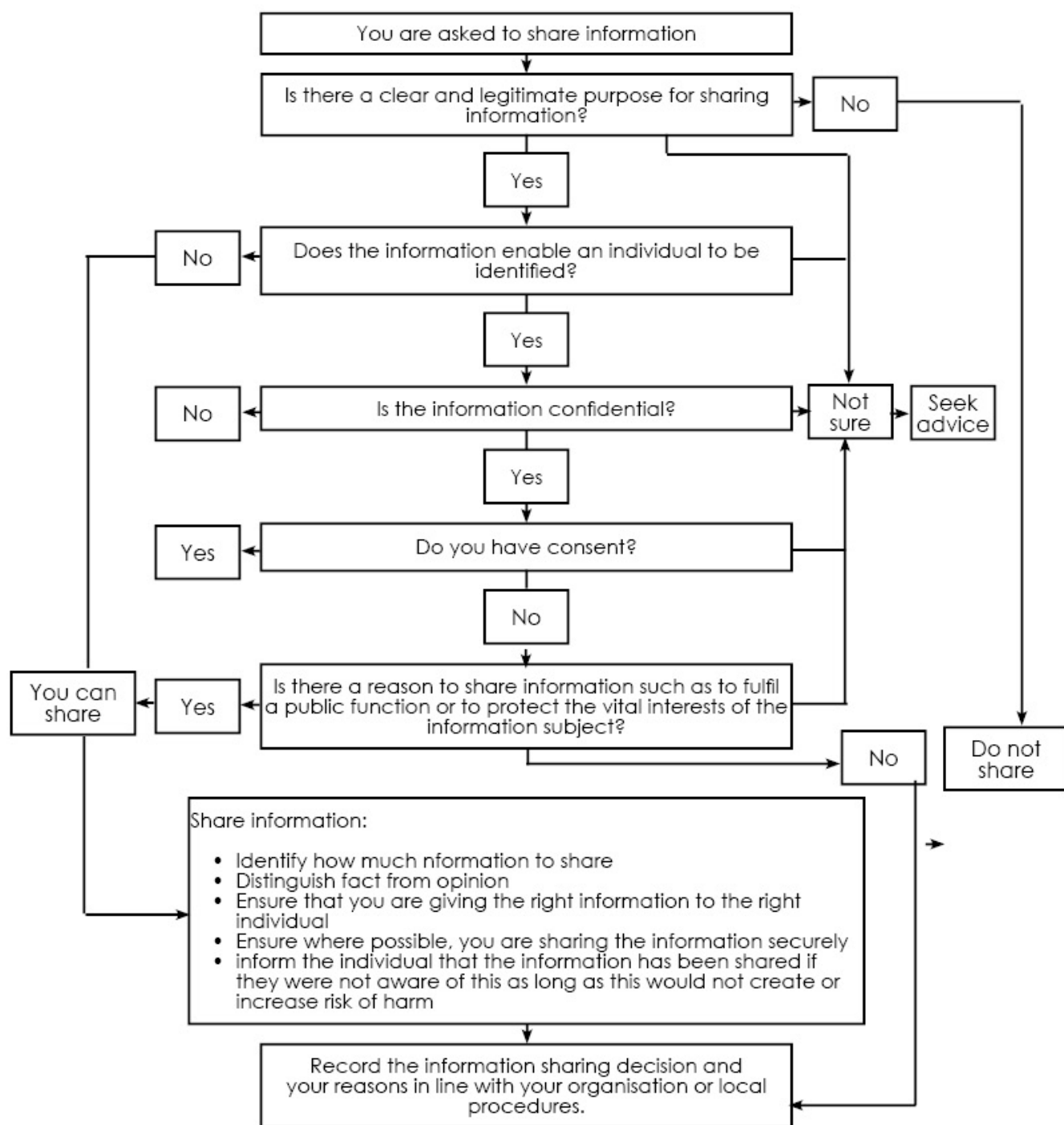
28. Complaints and concerns about school safeguarding policies

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

Other complaints will be dealt with in accordance with our complaints policy.

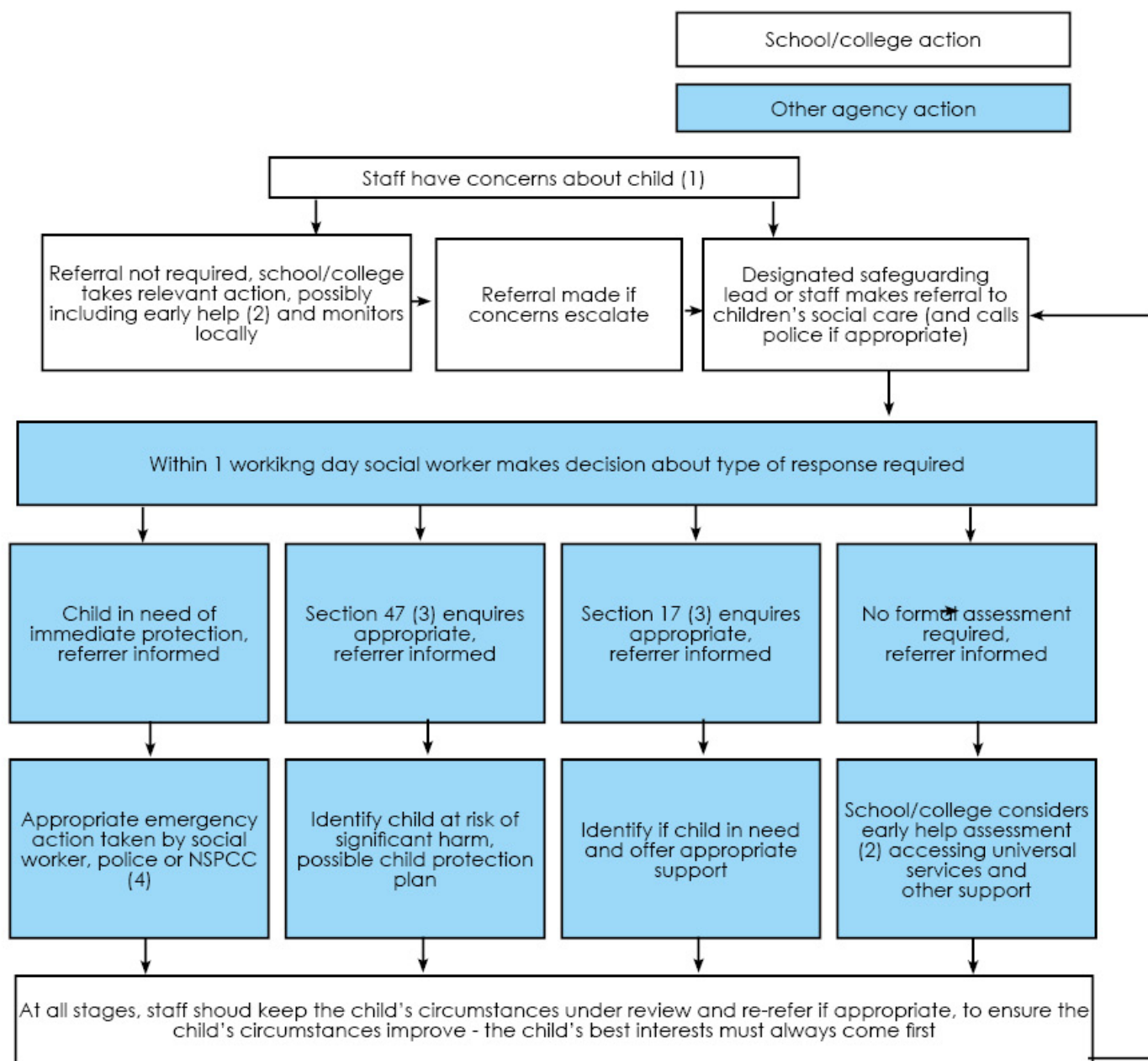
Appendix A

Flowchart - When and how to share information



Appendix B

Actions if there is a concern about a child



Appendix C

Types of abuse

Abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
 - Emotional abuse may involve:
 - Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
 - Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
 - Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
 - Seeing or hearing the ill-treatment of another
 - Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
 - Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
 - Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
 - Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
 - Protect a child from physical and emotional harm or danger
 - Ensure adequate supervision (including the use of inadequate care-givers)
 - Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix D: Specific safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education 2025, Staff must be aware of the following indicators:

Children who are absent from education

- A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
- There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:
 - Are at risk of harm or neglect
 - Are at risk of forced marriage or FGM
 - Come from Gypsy, Roma, or Traveller families
 - Come from the families of service personnel
 - Go missing or run away from home or care
 - Are supervised by the youth justice system
 - Cease to attend a school
 - Come from new migrant families
- We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
- Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.
- If a staff member suspects that a child is suffering from harm or neglect, we will follow our child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

- Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
- The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
- The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- Indicators of CCE can include a child:
 - Appearing with unexplained gifts or new possessions

- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL/DDSL who will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

- Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, and 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. It may, or may not, be accompanied by violence or threats of violence.
- The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.
- CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.
- In addition to the CCE indicators above, indicators of CSE can include a child:
 - Having an older boyfriend or girlfriend
 - Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL and report on My Concern. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

- Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.
- Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- 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)

- 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)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.
- If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy.
- When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

- Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.
- Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
- Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.
- Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.
- If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. As part of [Operation Encompass](#).
- The DSL/ DDSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- The DSL and DDSLs will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity.

- Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

- So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
- Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
- All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

- The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Please refer to [Pan Bedfordshire Practice Guidance for practitioners on Female Genital Mutilation \(FGM\)](#) for possible indicators and further information.
- Section 8.1 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

- Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.
- It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.
- Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.
- If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalization

- **Radicalisation** refers to the process of a person legitimising support for, or use of terrorist violence
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

- Endangers or causes serious violence to a person/people
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system
- The use or threat of terrorism 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.
- Schools have a duty to prevent children from being drawn into terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

- We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
- We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.
- There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.
- Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in the Prevent Policy

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical 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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Appendix E

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#) which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or gender questioning phobic bullying; or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- Bedford Borough Safeguarding Children Board Interagency Child Protection Procedures <https://bedfordscb.proceduresonline.com/>
- The procedures of the Pan Bedfordshire [Safeguarding Children Partnerships](#) and Safeguarding Adults Boards
- [Sexting in schools and colleges: responding to incidents and safeguarding young people](#) (UK Council for Child Internet Safety, 2016)

- [Criminal exploitation of children and vulnerable adults county lines \(Home Office guidance\)](#)

This policy also complies with our funding agreement and articles of association.

This policy should be understood alongside school policies and procedures on related safeguarding issues including our:

- Accessibility plan
- Administration of medication/Supporting children with medical conditions
- Allegations against staff policy
- Attendance and Children Missing Education Policy
- Behaviour and Anti-Bullying Policy
- Code of Conduct
- Equality information and objectives
- Health and safety policy
- Information Sharing Policy
- Physical Intervention Policy
- Mental Health and Wellbeing Policy
- Relationship, Sex and Health Education policy
- Special Educational Needs Policy
- Searching, Screening and Confiscation (DfE, January 2018)
- Use of Internet/ Online Safety Policy
- Whistleblowing Policy

Context: Staff are fully aware of all the specific safeguarding matters listed in the above policy. To provide the most effective safeguarding and child protection, we identify risks that are more likely to arise given our pupil cohort and other school specific factors. The summary below lists some key risks and the work to mitigate them. The safeguarding policy also includes key principles and procedures that must be followed when the below safeguarding matters occur.

Key Risks			Mitigation		
Risk	Rationale for risk	Staff training	Curriculum	Other	Policy
Online safety	Any pupil can be vulnerable online, however there are some pupils, for example pupils who attend alternative provision and those with SEND, who may be more susceptible to online harm or have less support from family or friends in staying safe online. Greys Education Centre (GEC) ensures pupils and their families receive the knowledge and support they need to make sound decisions and be safe	Online safety training is delivered to staff annually.	Pupils are taught about online safety as part of the curriculum.	BILTT ensures appropriate filters and appropriate monitoring systems are in place. The school raise parents' awareness of internet safety in This policy is shared with parents. Online safety is covered through parents' evenings	Online Safety Policy
Child on Child Abuse, including sexual harassment and sexual violence	Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally hurt others. All staff should recognise that children can abuse other children. This is generally referred to as child	Staff know sexual harassment is unwanted conduct of a sexual nature that can occur online and offline. High-quality training for teachers delivering RSHE is provided.	There is a strong and positive PHSE /RSHE curriculum that tackles such issues as prejudiced behaviour and provides open discussion of topics that children and young people tell us	GEC has clear procedures for responding to a report of sexual violence or sexual harassment. Through the school council, we	Child on Child Abuse Policy including anti-bullying

	on child abuse and can take many forms. Some GEC pupils are less able to tolerate behaviour from their peers which they find challenging. A high proportion of pupils have received a PEX. Pupils often have social, emotional and mental health difficulties, as well as SEND, and can struggle to understand the features of appropriate relationships	Staff will not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood, with particular reference to LGBTQ+ abuse which will be recorded on the appropriate forms.	they find particularly difficult, such as consent and the sending of 'nudes'	encourage young people to develop a deeper understanding of acceptable behaviour	
Bullying	Some GEC pupils are more likely to bully and be bullied because of their SEND, experiences of trauma, and social, emotional and mental health difficulties. Pupils may not identify or report bullying so it is important that staff are alert to signs of bullying, and the curriculum develops pupils' understanding.	Staff are trained in restorative justice principles and use these to resolve conflict. Staff recognise that vigilant supervision (both in and out of lessons), and monitoring of relationships between pupils is crucial.	The topic of bullying is addressed through the PSHE/RSHE programme, in drama and English lessons and in Tutor Group. A key curriculum aim is to engender pupils' understanding, respect and care of others, including those who possess one or more protected characteristics such as trans people.	Behaviour, safeguarding, and attendance information is used to identify potential bullying	Anti-Bullying Policy
Child Criminal Exploitation (CCE), including county lines	GEC pupils are at higher risk of being coerced or manipulated into criminal activity. KCSIE is clear that children can be targeted and recruited into county lines in a number of locations including pupil referral units	Annual staff training makes clear the potential indicators of CCE. For example, missing episodes (both from home and school), or	With due regard for pupils' age, cognition and emotional maturity, the risk of CCE and county lines are explained to pupils.	As with other safeguarding risks, staff are alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.	Policy on Drug Education and Drug Related Incidents

		unexplained gifts or new possessions	Drug Education is delivered via the science curriculum and PSHE lessons supported, where judged appropriate, by external drug educators i.e. Aquarius		
Radicalisation	GEC pupils are vulnerable to extremist ideology and radicalisation. For example, a right wing ideology that holds hateful views of people of certain races and religions.	Annual staff training makes clear the potential indicators of radicalisation. Governors are clear about their statutory responsibilities regarding the Prevent duty	The curriculum ensures pupils develop positive attitudes to people who possess one or more protected characteristic, and acceptance of and engagement with the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.	As with other safeguarding risks, staff are alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.	