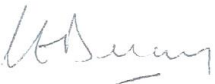




Child Protection and Safeguarding Policy

This policy applies all pupils, including in the EYFS

Signed:	
Chair of Trust Board:	Claire Delaney
Approved:	1 September 2026
Renewal period	Annually
Review Date:	1 September 2027

KEY CONTACTS

Role	Name	Contact details
Designated Safeguarding Lead	Rob Farrell	safeguarding@rutherfordhouseschool.co.uk
Deputy Designated Safeguarding Lead	Chrissy Cowen Rayanne Archer Mark Needham Elliot Hopkin Shannon McDonagh	safeguarding@rutherfordhouseschool.co.uk
Headteacher	Rob Farrell	Please email the school office: info@rutherfordhouseschool.co.uk
BPET Director of Education/ Executive Headteacher (if applies)	Alison Colenso	alison.colenso@BPET.co.uk 020 3108 0363
BPET Chief Executive	Mark Greatrex	Mark.greatrex@BPET.co.uk 020 3018 0363
BPET Safeguarding & Compliance Auditor (Safeguarding Adviser)	Chris Sanderson	info@BPET.co.uk 020 3018 0363
LA Multi Agency Safeguarding Hub (MASH) Team	Wandsworth MASH Team	mash@wandsworth.gov.uk 020 8871 6622 (9am – 5pm) 0208871 6000 (out of hours)
Local Authority Designated Officer (LADO)	Anita Gibbons Anita.Gibbons@richmondandwandsworth.gov.uk 07 974 58 6461 Wandsworth LADO lado@wandsworth.gov.uk 020 8871 6622 / 020 8871 7208	
Local Safeguarding Children Board (LSCB)	Wandsworth Safeguarding Children Partnership (WSCP)	wscp@wandsworth.gov.uk 020 8871 7401
Joint Police and Children's Social Care Protocol for Dealing with Children Missing from Care	Wandsworth Safeguarding Children Partnership www.wscp.org.uk wscp@richmondandwandsworth.gov.uk 020 8871 7401	
LA's Children's Social Care - A Child Centred System Understanding Thresholds	mash@wandsworth.gov.uk 020 8871 6622 (9am – 5pm) 0208871 6000 (out of hours)	

Contents

Bellevue Place Education Trust – Our commitment	4
Our strong safeguarding culture	4
Safeguarding legislation and guidance	5
Roles and responsibilities	5
2.1 The Designated Safeguarding Lead (DSL):	6
2.2 The deputy Designated Safeguarding Lead(s):	6
2.3 The safeguarding Governor/trustee	6
Children who may be particularly vulnerable	7
Children with special educational needs and disabilities	8
Children who are absent from education	8
Alternative provision	9
Mental health	9
Children who are lesbian, gay, bi or trans (LGBT)	10
Child-on-child abuse (including harassment and violence)	11
10 Serious violence	13
11 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	13
11.5 Child Criminal Exploitation (CCE)	14
11.6 Child Criminal Exploitation (CCE) Indicators	14
11.7 Child Sexual Exploitation (CSE)	14
11.8 Child Sexual Exploitation (CSE) Indicators	15
12 County Lines	15
13 Children and the court system	16
14 Self-Generated Intimate Images (also known as Sharing nudes and semi-nudes)	16
15 Online safety	17
16 Electronic Devices and Camera Policy	18
17 Domestic abuse	21
18 Honour or faith-based abuse	22
18.4 Female Genital Mutilation	22
18.5 Forced Marriage	22
19 Radicalisation and Extremism	23
20 Staff/pupil relationships	23
21 Safeguarding in Sport	24
22 Safeguarding in Boarding and Residential Accommodation	24
23 Safeguarding concerns and allegations made about staff, supply staff, contractors, trainee teachers and volunteers	24
24 Whistle blowing if you have concerns about a colleague	25
25 Staff and local governor/trustee training	25
26 Safer Recruitment	25
27 Site security	26
28 Child protection procedures	26
29 Referral to children's social care	27
30 Reporting directly to child protection agencies	27

32 Confidentiality and sharing information	28
33 Special Circumstances	29
34 Policy on Restrictive Intervention; The Use of Reasonable Force and Acceptable Physical Contact	31
35 Vetting visiting speakers	37
Appendix One - Four categories of abuse	39
Appendix Two - Related Safeguarding policies	40

Child Protection and Safeguarding Policy

Bellevue Place Education Trust – Our commitment

Learn, Enjoy, Succeed

BPET is a growing family of autonomous schools that strive for excellence for the communities they serve. Our staff are empowered to balance academic rigour and curricular breadth to inspire confidence, creativity and respect. Our pupils are at the heart of everything we do as to LEARN, ENJOY and SUCCEED.

LEARN

We offer a breadth and ambition of provision that supports an exceptional academic education, nurturing every child's learning journey – regardless of ability, background or special educational needs – and helping them develop a lifelong passion for learning.

ENJOY

We believe learning should be enjoyable, and that through this enjoyment children develop life-long learning habits. We achieve this by creating opportunities for all children to reach their full potential at school, and to enjoy school life – helping to ensure pupils grow into happy, independent and confident learners.

SUCCEED

We strive for excellence, aiming to ignite ambition, aspiration, pride and a desire to contribute to society. We prepare our pupils to approach life with confidence, purpose and integrity.

Working together: the BPET way

We achieve far more by learning, supporting and collaborating within and across our network of schools and communities. We do so with an unwavering and shared commitment to equality, diversity, inclusion, and respect.

Our strong safeguarding culture

0.1 Why it is important

- 0.1.1 Safeguarding is everyone's responsibility, and it is the duty of the BPET to safeguard and promote the welfare of children. **'Children' includes everyone under the age of 18.** This is our core safeguarding principle.
- 0.1.2 In adhering to this principle, we focus on providing a safe and welcoming environment for all our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All our children have equal rights to support and protection.
- 0.1.3 One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, and trustees, all of whom are trained upon its contents and on their safeguarding duties. All staff, volunteers, and trustees receive safeguarding and child protection training at induction and refresher training at least

annually. Training records are maintained securely and are available for inspection by the local authority or other relevant regulatory bodies. We update this policy annually to reflect changes to law and guidance and best practice. Any interim updates required by changes in legislation, statutory guidance, or best practice will be incorporated as necessary.

0.1.4 The school recognises that safeguarding incidents can occur outside of school and online. All staff will consider the context within which safeguarding concerns occur, known as contextual safeguarding.

0.1.5 This policy should be read alongside our other safeguarding policies, set out in Appendix Two.

0.2 What it means for our pupils

0.2.1 We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional to the child. **It also includes contributing to broader, multi-agency strategic discussions about safeguarding children.**

0.2.2 All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or a safeguarding issue will receive appropriate support.

0.2.3 Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.

0.2.4 Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' **attendance and/or** behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse. Staff are aware that abuse can occur between children, including sexual harassment, bullying, and harmful sexual behaviours. Staff are aware that child to parent or care-giver abuse is also a serious safeguarding concern. All concerns about child-on-child and child to parent or care-giver abuse must be reported to the DSL or Deputy DSL, who will take appropriate action in line with local safeguarding procedures.

0.2.5 All of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

Safeguarding legislation and guidance

1.1 The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2026)
- Working Together to Safeguarding Children (2026)
- What to do if you're worried a child is being abused (2015)
- Prevent Duty guidance: Guidance for specified authorities in England and Wales (2023)
- The Teacher Standards 2012
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Domestic Abuse Act 2021
- PACE Code C 2019
- Crime and Policing Act 2026
- Statutory Framework for the Early Years Foundation Stage (EYFS)
- The Data (Use and Access) Act 2025
- Public Sector Equality Duty

- DfE Guidance on Restrictive Interventions, April 2026

Roles and responsibilities

Key contacts overview is contained on page 2 of this policy and shared with all staff in the school.

2.1 The Designated Safeguarding Lead (DSL):

2.1.1 The designated safeguarding lead takes **lead responsibility** for safeguarding and child protection (including online safety) in the school. The school recognises that early identification and provision of help is crucial. All staff should be alert to children who may benefit from early help, and concerns should be shared with the DSL, who will decide whether a referral to early help services is appropriate. The DSL duties include:

- ensuring CPOMs is used effectively by all staff and regular training takes place
- ensuring child protection policies are known, understood and used appropriately by staff
- working with the board of trustees to ensure that BPET's child protection policies are reviewed annually and that the procedures are reviewed regularly
- acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters
- liaising with the headteacher regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and be aware of the requirement for Children to have an Appropriate Adult in relevant circumstances (i.e. PACE Code C 2019).
- acting as a point of contact with the three safeguarding partners
- making and managing referrals to children's social care, the police, or other agencies
- keeping detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions (including where referrals were or were not made)
- taking part in strategy discussions and inter-agency meetings
- liaising with the "case manager" and the designated officer(s) at the local authority if allegations are made against staff
- making staff aware of training courses on National College and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child's new school as soon as possible
- work with the headteacher to ensure that the relevant staffing ratios are met, where applicable.
- work with the headteacher to ensure that each EYFS child is assigned a key person.
- The DSL must be a member of the school leadership team (SLT).

2.2 The deputy Designated Safeguarding Lead(s):

2.2.1 Our Deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis, and like DSL training, is updated every 2 years and this includes inter-agency working and Prevent, plus informal updates at least annually. The ultimate lead responsibility for child protection remains with the DSL.

2.2.2 The school ensures robust arrangements for periods when the DSL is unavailable due to illness, leave or other circumstances. This may include a shared mailbox or similar arrangements to ensure that safeguarding concerns are received, monitored and acted on without delay.

2.3 The safeguarding Governor/trustee

2.3.1 The role of the safeguarding governor/auditor is to provide support and challenge to the DSL and the leadership of the school on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. The role includes:

- understanding the requirements of the Governance Handbook and Keeping children safe in education 2026
- supporting and challenging the DSL on the standards of safeguarding at the school
- confirming that consistent and compliant safeguarding practice takes place across the school
- reporting to the board of trustees about the standard of safeguarding in the school

2.3.2 The DSL and the Safeguarding & Compliance governor/auditor meet once a year to discuss safeguarding issues and to agree next steps to continuously improve safeguarding practices in the school. These are conducted through annual BPET Safeguarding Audits with actions that are monitored through the BPET Regulations and Compliance Audits. A report and overview of these visits go to the school Local Governance Board (LGB) for monitoring and the BPET Director of Education, with a summary report approved by the BPET Board of the completed actions annually.

Children who may be particularly vulnerable

3.1 Some children are at greater risk of abuse, neglect and exploitation. This increased risk can be caused by many factors including social exclusion, isolation, discrimination, and prejudice. To ensure that all our pupils receive equal protection, we give special consideration to children who:

- are vulnerable because of their race, ethnicity, religion, special education needs, disability, gender identity or sexuality
- Are involved in the court system or have a family member in prison.
- are vulnerable to being bullied, or engaging in bullying
- are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism
- live in chaotic or unsupportive home situations
- live transient lifestyles or live away from home or in temporary accommodation
- are affected by parental substance abuse, domestic violence, or parental mental health needs
- do not have English as a first language
- experience or have experienced bereavement or mental health difficulties
- are in care or privately fostered, or have returned home to their family from care
- have experienced multiple suspensions and are at risk of, or have been permanently excluded
- are pregnant or are a parent themselves
- have exhibited early signs of abusive, violent and/or harmful behaviours
- have been repeatedly removed from the classroom, experienced multiple suspensions, are on a part-time timetable or are at risk of being permanently excluded from school.

3.2 **Children who are young carers** may also be vulnerable; staff focus on early identification to ensure that young carers receive support at the right time from the right services. Staff remain alert to their needs and recognise that their responsibilities may impact on attendance, attainment, behaviour and wellbeing.

3.3 Children with Medical Conditions

Staff are vigilant in respect of the potential additional vulnerabilities of children with medical conditions. A safeguarding referral would be needed only where an incident indicated that a child might be at increased risk of neglect, abuse or exploitation because of their medical condition. For

example, this might occur where relevant medical information is not provided to a school or where children are repeatedly sent to school without essential medication.

3.4 Children and Young People on Work Experience

Since this is a primary school, its pupils will not be undertaking work experience. In circumstances when the school hosts pupils or students under the age of 18 from other schools or colleges for work experience, work placements or similar arrangements, the school is aware that it has a twofold safeguarding duty; both for its own pupils and also for the young person being hosted by the school. In such circumstances, a risk assessment is completed, in line with government guidance on "vulnerable staff: young workers", which will include an assessment of the tasks which can safely be assigned to the person being hosted and the identification of any training to be provided. If a tutor or supervisor visits the school, for example, to monitor the work of the young person being hosted, the school will obtain confirmation from the employer that all the required recruitment checks have been completed, as for third party staff. The school understands that it has a duty to follow its own safeguarding procedures should any safeguarding concerns arise relating to the tutor/supervisor visiting the school.

3.5 Temporary Accommodation Notification Duty

The Children's Wellbeing and Schools Act 2026 places a new duty on local housing authorities to notify educational institutions, health visiting services and general medical practices, when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parents or carers. The notification will enable school and college staff to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes.

Children with special educational needs and disabilities

4.1 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.
- The need for intimate care or that these children are isolated from others.
- That these children are more likely to be dependent on adults for care, and
- These children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

4.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

Children who are absent from education

5.1 Children being absent from education for prolonged periods on an increasing basis and/or on repeat occasions, and children with unexplainable and/or persistent absences from education, can be an indicator of abuse, neglect and exploitation including sexual abuse or exploitation, child criminal

exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

- 5.2 We closely monitor attendance, absence and exclusions and our DSL will take appropriate and proactive action including notifying the local authority, particularly where children go missing on repeated occasions on an increasing basis and/or are missing for periods during the school day, in line with the BPET Attendance Policy.
- 5.3 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. The school will provide lessons focusing on building children's confidence and abilities rather than simply warning them about all strangers.
- 5.4 The school recognises that children missing from education can be a vital warning sign of safeguarding issues. We follow DfE statutory guidance and inform the Local Authority of any pupil removed from the school roll or who fails to attend regularly.

Alternative provision

- 6.1 Where a pupil is placed with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and will ensure we are satisfied that the placement meets the pupil's needs.

Mental health

- 7.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils.
- 7.2 All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff are also aware that, where children have suffered adverse childhood experiences, those experiences can impact on their mental health, behaviour, and education. Staff should raise mental health concerns with the DSL, who will consider them as part of the school's safeguarding approach.
- 7.3 All staff are aware that there are potential warning signs when a child is struggling with their mental health. These include:
 - 7.3.1 Significant changes in behaviour.
 - 7.3.2 Ongoing difficulty sleeping
 - 7.3.3 Withdrawing from social situations.
 - 7.3.4 Not wanting to do things they usually like; and
 - 7.3.5 Physical signs of self-harm or neglecting themselves.
- 7.4 Where staff are concerned that a child's mental health is also a safeguarding concern, they will follow the procedures described in this policy and discuss it with the DSL or a deputy who will alert other relevant services as necessary. The role of education staff is not to diagnose mental health problems. Rather, staff are trained to recognise any mental health warning signs and identify children who may be struggling with their mental health. Staff help the school to fulfil four key roles;
 - 7.4.1 Promoting good mental wellbeing and preventing the onset of mental illness
 - 7.4.2 Observing pupils and identifying early those who may be experiencing or at risk of developing mental health problems
 - 7.4.3 Making sure early targeted support is provided

7.4.4 Liaising with and referring to specialist services where needed.

Staff can also make use of the local Mental Health Support Team, which are currently being rolled out to schools.

Children who are lesbian, gay, bi or trans (LGBT)

- 8 The fact that a child or a young person may be lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. Unfortunately, children who are lesbian, gay, or bisexual, or are simply perceived to be lesbian, gay, or bisexual, can be targeted by other children. The risk to these children can be compounded where children who are lesbian, gay, or bisexual lack a trusted adult with whom they can be open.
- 8.1 Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with a trusted adult, with whom they can be open with them. The role of staff is to be responsive rather than initiate action relating to gender questioning children.
- 8.2 When supporting a gender questioning child, as recommended by statutory guidance, we take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Staff will not adopt any changes related to social transition unless a decision has been made by the school, following involvement with the child's parents or carers. Staff will take time to understand the thoughts and feelings of children who are questioning their gender and will be professionally curious about the child's experiences, including potential vulnerabilities. In cases where a child speaks to a member of staff about his or her feelings but does not ask the school to make any changes around support with social transition, there is no reason to share this information further, unless there is a related safeguarding risk.
- 8.3 The school will ensure that all decision-making processes around requests for support with social transition are documented and that records are kept.
- 8.4 The school is required by law to record the child's biological sex and to ensure that all relevant staff are aware of this information. This serves to maintain an awareness that some children may be 'living in stealth' regarding their biological sex, particularly if they transition before puberty and other pupils may be unaware of their biological sex.
- 8.5 In circumstances where a child wants to fully or partially reverse a request that has been previously agreed, the school will work closely with parents or carers and relevant experts to make sure that a child in this position is supported.
- 8.6 New requirements have been introduced which affect the use of toilets, changing rooms and showers.
 - 8.6.1 Schools must not allow children into toilets designated for the opposite biological sex. This includes where schools are responding to requests to support social transition for children who are questioning their gender.
 - 8.6.2 Schools must provide separate toilets for boys and girls who are aged 8 and over apart from where a mixed-sex toilet is in a room intended for use by one pupil at a time and is lockable from the inside.
 - 8.6.3 If a gender-questioning child does not wish to use the toilets designated for their biological sex, the school will consider whether it can provide an alternative facility without compromising single-sex toilet provision. The school will keep a clear record of these situations, communicate them appropriately and review them regularly.
 - 8.6.4 Schools must not allow a child aged 11 or over at the start of the school year to undress in front of a child of the opposite biological sex. Schools must provide suitable changing accommodation and showers for pupils who are aged 11 years or older at the start of the school year, considering age, numbers, sex and any special requirements they may have.
 - 8.6.5 When responding to a request to support social transition, schools must not allow a child to access changing rooms designated for the opposite sex.
 - 8.6.6 If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, the school will consider whether it can provide an alternative changing or

washing facility without compromising the provision of single-sex facilities. The school will keep a clear record of these situations, communicate them appropriately and review them regularly.

Child-on-child abuse (including harassment and violence)

- 9 Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as ‘banter’, ‘just having a laugh’, ‘part of growing up’ or ‘boys being boys’. The school takes a zero-tolerance approach to behaviour which constitutes a safeguarding concern, including sexual harassment and sexual violence, misogyny, misandry, homophobia, biphobia, racism, derogatory behaviour or other forms of physical behaviour or conflict; these are never acceptable, and will not be tolerated.
- 9.1 The school works proactively to combat such behaviour, for example in Assemblies and PSHE lessons. This includes “school to add some telling examples here of the preventative educational work which it undertakes with the pupils in this respect.”
- 9.2 It is more likely that boys will be perpetrators of child-on-child abuse and girls victims, but allegations will be dealt with in the same manner, regardless of whether they relate to boys or girls.
- 9.3 All staff should be clear about the school’s policy and procedures for addressing child-on-child abuse and maintain an attitude of ‘it could happen here’. Staff are also aware, as noted in the anti-bullying policy, of the times of day and the places where children might be at highest risk.
- 9.4 Child-on-child abuse can take many forms, including:
- **physical abuse** such as shaking, hitting, biting, kicking or hair pulling
 - **bullying**, including cyberbullying, prejudice-based and discriminatory bullying
 - **sexual violence** such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes
 - **Sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse and which may include misogyny/misandry.
 - Serious physical assault and harm, or the threat of harm with a weapon.
 - **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
 - **upskirting**, which involves taking a picture under a person’s clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm. It affects people of any gender and is a specific criminal offence in the UK and a form of image-based sexual abuse.
 - **consensual and non-consensual sharing of nude and semi-nude images and/or videos** (including those generated by AI), and including pressuring others to share sexual content
 - **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse and stalking.
 - **initiation/hazing** – used to induct newcomers into sports teams or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond .
- 9.5 Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.
- 9.6 All staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.
- 9.7 Minimising risk**
- 9.7.1 We take the following steps to minimise or prevent the risk of child-on-child abuse:
- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries

- Using assemblies to outline acceptable and unacceptable behaviour
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs, and other suitable activities.
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable.

9.8 Investigating allegations

9.8.1 All allegations of child-on-child abuse should be passed to the DSL immediately and recorded on CPOMs. The DSL will investigate and manage the allegation as follows:

- **Gather information** - children and staff will be spoken with immediately to gather relevant information.
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Recorded** – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on the school's child protection and safeguarding systems and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.

9.8.2 Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping children safe in education 2026. The DSL will decide on a case-by-case basis whether to carry out an immediate risk and needs assessment.

9.8.3 Reports of rape or assault by penetration are especially serious. While the school/trust establishes the facts and liaises with children's social care and the police, the alleged perpetrator(s) may be removed from any shared classes with the victim. The school/trust will also consider how to maintain a reasonable physical separation between the victim and alleged perpetrator(s) across school, including before or after school-based activities, and on transport to and from the school.

9.8.4 Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL and record on CPOMs in accordance with this policy.

9.8.5 Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

9.8.6 Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce several complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

- 9.8.7 The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work.
- 9.8.8 Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.

10 Serious violence

- 10.1 Serious violence is a continuing safeguarding concern which may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and criminal exploitation. All staff are aware of the signs that a child may be at risk of or involved in serious violence, including:
 - 10.1.1 An increased absence from school or college or a significant decline in educational performance.
 - 10.1.2 A change in friendships or relationships with older individuals or groups.
 - 10.1.3 Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and
 - 10.1.4 Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 10.2 Concerns about a child carrying, using or intending to use a weapon should be reported to the DSL, who should carry out a risk assessment so that staff are made aware of the risk factors and how they should be managed. In this respect, targeted interventions, such as mentoring or therapeutic support are key.

11 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

- 11.1 Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:
 - 11.1.1 Age
 - 11.1.2 Gender
 - 11.1.3 Sexual identity
 - 11.1.4 Cognitive ability
 - 11.1.5 Physical strength
 - 11.1.6 Status
 - 11.1.7 Access to economic or other resources
- 11.2 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

- 11.3 CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.
- 11.4 CCE and CSE may occur in the context of gangs. Children may be additionally vulnerable because they identify as part of a network or group and, thus, it may not be recognised that they are victims because they have been coerced into engaging in exploitation.

11.5 Child Criminal Exploitation (CCE)

- 11.5.1 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- 11.5.2 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.
- 11.5.3 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- 11.5.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

11.6 Child Criminal Exploitation (CCE) Indicators

- 11.6.1 CCE indicators can include children who:
 - 11.6.1.1 appear with unexplained gifts or new possessions
 - 11.6.1.2 associate with other young people involved in exploitation
 - 11.6.1.3 suffer from changes in emotional well-being
 - 11.6.1.4 misuse drugs or alcohol
 - 11.6.1.5 go missing for periods of time or regularly return home late
 - 11.6.1.6 regularly or increasingly miss school or education or do not take part in education

11.7 Child Sexual Exploitation (CSE)

- 11.7.1 CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape, penetration with an object or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.
- 11.7.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. Most sexual abuse is committed by someone known to the victim.

- 11.7.3 CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- 11.7.4 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. Financially-related sexual exploitation (also known as sexploitation) is a growing concern, which requires particular vigilance on the part of staff.

11.8 Child Sexual Exploitation (CSE) Indicators

- 11.8.1 The above indicators can also be indicators of **CSE**, as can children who:
- 11.8.1.1 have older boyfriends
 - 11.8.1.2 suffer sexually transmitted infections or become pregnant
- 11.9 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.
- 11.10 Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.
- 11.11 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

12 County Lines

- 12.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.
- 12.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors set out at paragraph 11 of this policy.
- 12.3 Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 11.4 of this policy, with the main indicator being missing episodes from home and/or school.
- 12.4 Additional specific indicators that may be present where a child is criminally exploited include children who:
- go missing and are subsequently found in areas away from home
 - have been the victim or perpetrator of serious violence (e.g. knife crime)
 - are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
 - are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
 - are found in accommodation with which they have no connection or in a hotel room where there is drug activity
 - owe a 'debt bond' to their exploiters
 - have their bank accounts used to facilitate drug dealing.

- 12.5 All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

13 Children and the court system

- 13.1 Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. A helpful guide for pupils aged 5-11 is available to support them.
- 13.2 Children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

14 Self-Generated Intimate Images (also known as Sharing nudes and semi-nudes)

- 14.1 Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing self-generated intimate images means the creation, sending, or posting online of nude or semi-nude images, videos, or live streams by young people under the age of 18, including those created with artificial intelligence (AI). This could be via social media, gaming platforms, chat apps, or forums, or carried out offline between devices via services like Apple's AirDrop.
- 14.2 Images may be taken or created by the child themselves or by another person. They may also be digitally altered or wholly generated using AI, including what are sometimes described as 'deepfakes' or 'deep nudes'.
- 14.3 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.
- 14.4 The motivations for taking and sharing self-generated intimate images are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
- children and young people find self-generated intimate images online and share them claiming to be from a peer
 - children and young people digitally manipulate an existing image of a young person into a self-generated intimate image online
 - images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to public shame.
- 14.5 Staff are aware that the creation and sharing of self-generated intimate images constitutes harmful sexual behaviour (HSB) and is part of a continuum which can lead to sexual violence. The school, therefore, takes a safeguarding approach in response to all incidents involving the sharing of self-generated intimate images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion,

exploitation, or vulnerability. All incidents involving self-generated intimate images will be managed as follows:

- The incident will be referred to the DSL immediately and recorded on CPOMs and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern that a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

14.6 The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes - [UKCIS advice 2024](#) . The school will have regard to this advice when managing these issues.

15 Online safety

15.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate and effective filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. These filtering and monitoring systems block harmful and inappropriate content, and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least annually) to ensure their effectiveness and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils.

15.2 Pupil's understanding of how to keep safe online, as part of a broad and balanced curriculum, and their resilience in protecting themselves and their peers will happen in the following ways:

15.2.1 Accessing information safely e.g. not sharing personal details (name, age, school, address) with others.

15.2.2 Awareness of "stranger danger" online e.g. online friends are not real friends.

15.2.3 Pupils are encouraged to tell an adult if they have seen something online that they are worried about or if they have been asked for personal information. In addition, to ensure children can report their concerns easily, the school's website has a link to the Child Exploitation and Online Protection (CEOP) website.

15.2.4 Pupils learn about the safe and effective use of AI, together with the risks which this technology presents. This is through our PSHE and Computing schemes of work, alongside assemblies and visiting speakers.

15.2.5 Use of the internet whilst in the company of an adult.

15.3 Access to the internet in schools will be by adult demonstration and with directly supervised access to specific, approved on-line materials. BPET schools use an internet filtering and monitoring system. We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe. We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online. Periodically the school runs e-safety information meetings for parents, which may involve an external speaker, in order to raise their awareness of e-safety matters and help them develop their children's safe use of the Internet. Parents also have access to all of the online safety content and training available on the National College Online platform.

15.4 The teaching of safeguarding, within and beyond the curriculum, includes the teaching of online safety to raise children's awareness of the issues and develop their capacity and resilience in dealing with them. The school has regard to DfE guidance, produced in collaboration with UKCIS and the Samaritans, on Harmful Online Challenges and Online Hoaxes, which includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. The guidance defines a hoax as a deliberate lie, designed to seem truthful, and notes that online challenges generally involve users recording themselves taking a challenge, and then distributing the video through social media channels, inspiring or daring others to repeat the challenge.

15.5 Online safety risks can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **Contact:** being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams.

15.6 All staff are aware of these risk areas and should report any concerns to the DSL.

15.7 The school implements national statutory guidance in relation to managing cyber security. Accordingly, the school has created, implements and maintains a cyber risk assessment and a cyber awareness plan, and all staff and at least one governor undertake at least annual cybersecurity training.

15.8 Cybercrime is criminal activity committed using computers and/or the internet. It is broadly characterised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber-dependent' (crimes that can be committed only by using a computer). The latter is one of the most rapidly growing concerns and young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide preventative police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

16 Electronic Devices and Camera Policy

16.1 Use of Cameras and the manipulation and storage of images

16.2 In this policy terms such as 'photography', 'pictures', 'images', 'camera', 'device' and 'digital technology' include both still and video media. The term 'camera' includes mobile phones, iPads and any equipment which has the capacity to take photographs / videos.

16.3 At BPET we recognise that the appropriate use of photography enhances many aspects of school life and the pupils' education. Mobile technology has become more sophisticated over recent years and will continue to evolve. Wireless connections in particular, extend the capabilities of electronic

devices further; which allow access to new content and services, such as the internet, social networking sites and instant messaging. Many mobile devices offer camera, video and audio recording as standard. Mobile devices, alongside other technologies, aim to change the way we communicate. This speed of communication often provides security and reassurance; however, as with any other form of technology, there are associated risks.

16.4 Personal devices are only to be used by staff when on a designated break away from the pupils. At all other times, personal devices are to be switched off. The use of personal devices by pupils is carefully regulated. Pupils are not permitted to have mobile phones in their possession during the school day or on school visits. Where, by prior agreement with parents, a pupil is allowed to have a mobile phone for the journey to and from school, it will be handed in to the school office on arrival and collected on departure. In these circumstances, the school provides the pupil with clear guidance on keeping safe and not attracting trouble during the journey.

16.5 This policy is intended to ensure an environment in which children, parents and staff are safe from images being recorded and inappropriately used by providing a clear framework to ensure that

- the use of cameras and the storage of images reflect good practice
- the safeguarding needs of the pupils are met
- staff are not distracted from their work with children.

16.6 The policy also recognises that learning to use digital technology is an important part of the computing curriculum. Teaching needs to ensure that pupils are able to learn how to use digital cameras and to edit and store photographs with an understanding of safeguarding requirements, for themselves and others, which is appropriate for their age and taking due account of the cyber-bullying aspects of BPET School's anti-bullying policy. Reference should also be made to planning for the internet safety topic in the computing/PSHE scheme of work.

16.7 Photography is used at BPET Schools for a variety of purposes, including:

- Recording pupils' achievements, learning and progress.
- Contributing to each pupil's development file/profile/evidence portfolio.
- Providing evidence to support pupils' application for entrance/scholarship to their future schools.
- Recording school events and providing material for displays.
- Communication with parents, for example to help reassure new parents or carers of young children that they have settled well into school life and provide prompt information on their children's activities on residential trips.
- For publicity purposes (brochures, prospectus, media articles, website etc.) for both BPET Schools and Bellevue Place Education Trust.
- To support work undertaken by members of staff or students on placements for training and gaining further qualifications.

16.8 On their child's admission to a BPET School, parents are asked to sign a consent form in relation to their child being photographed at school or during school events via Arbor. The form provides the opportunity for parents to give permission at different levels (for example to consent to their child being photographed to record achievement and progress, but not for publicity purposes.) The form also gives parents the opportunity to state whether a child in a photograph can be named. The parent consent form sits in our MIS system, Arbor.

16.9 Responses to the photography consent form are collated and stored on the MIS system, Arbor. It is important that staff familiarise themselves with this information. If parents withhold consent for certain aspects of photography in relation to their child, this must be respected. Images should be checked to determine whether photographs have been taken which inadvertently include pupils for whom consent has not been given. If this is the case, images should be destroyed, cropped or otherwise edited to ensure that parental consent is respected. If an image is edited for this reason, the original must be destroyed.

16.10 Periodically, professional photographers visit BPET Schools by arrangement to take portrait photographs and formal pictures of sports teams etc. Care should be taken that parental consent is respected and also that parents have not unintentionally withheld consent regarding such photographs. Any areas of doubt should be discussed with the Headteacher, who will arrange for parents to be contacted as appropriate. It is not compulsory for pupils to be included in portrait and team photography, nor is there any obligation on parents to purchase the resulting photographs.

16.11 From time to time a teacher, student or trainee teacher on placement may undertake a case study of a child, for example, as part of a training course to gain a qualification. In such situations, parental consent with regard to photography must be respected. Case studies will only be undertaken following prior written consent from the parent or carer and, except by prior arrangement between the Headteacher and the parent/carer, the child's name will be changed in the case study to protect his or her identity.

16.12 Occasionally a photograph may be taken which inadvertently catches a pupil in an unfortunate, embarrassing or compromising position. If this is the case, the image and any copies of it must be destroyed immediately.

Photography by parents

16.13 It is very difficult to police the use of cameras by parents, for example at prize-giving or on the touchline at sports fixtures. However, if members of staff have concerns about the suitability of photography by parents, they should consult the Designated Safeguarding Lead and/or the Headteacher, who will consider the situation with reference to this policy and safeguarding procedures and take appropriate action. Concerns will be taken seriously, logged on CPOMs and investigated appropriately.

16.14 The parents' handbook includes guidelines for parents on the use of photography at school events.

16.15 Any parent who works at the school, for example as a volunteer, must abide by this policy. The teacher responsible (for example the Trip Leader for an educational visit which uses parent volunteers) must ensure that the parents involved are aware of this policy and abide by it.

16.16 If parents wish to make a video recording of a school event (nativity, concert, drama production etc), prior permission must be obtained from the Headteacher, who will consider the situation with respect to this policy and the levels of consent given by parents of other children involved. Since it is difficult to ensure that parental consent is respected in these situations, and not appropriate to share the details of consent given for particular children with other parents, the Headteacher may refuse permission for a video recording of the event to be made. As an alternative, a BPET School may make an official video recording/DVD, the editing of which, before it is made available to parents, will ensure that parental consent is respected.

Use of equipment

16.17 Except with specific permission from the Headteacher, staff may not use their own cameras, phones or other equipment to take pictures in school or at school events. A school camera is available in BPET schools for this purpose. Cameras are kept in a designated cupboard and should be signed out and back in when used. Please ensure that batteries are recharged as appropriate for the next user. Users bringing personal devices into a BPET school must ensure there is no inappropriate or illegal content on the device. Staff must ensure that this policy is observed when using other equipment which can be used in connection with photographs (photocopier, scanner, printer, iPads etc.)

Editing and storage of photographs

16.18 All images taken by members of staff or volunteers at school or on school activities remain the property of the school. Schools may require images to be deleted or edited as appropriate and may

also select images taken by members of staff or volunteers for other purposes, with due attention paid to the requirements of this policy.

- 16.19 When editing images, staff must take due professional care and ensure that edited images do not mislead or misrepresent. Care must also be taken to ensure that images do not result in their subject being vulnerable to embarrassment, teasing, bullying or abuse.
- 16.20 Close attention must be paid to the storage of images, particularly whilst kept on portable media such as external hard drives and memory sticks. Staff are responsible for the security of such media and the images they contain and must take all reasonable measures to ensure that they are kept safe and do not come into the possession of unauthorised people.
- 16.21 Images must at all times be kept on school equipment and storage media and not transferred to personal devices or internet storage facilities. Members of staff may transfer images to personal equipment for the purpose of sorting and editing but they must be transferred into a BPET school's photograph archive and deleted from personal equipment at the earliest opportunity.
- 16.22 All images must be stored permanently on the School's Google Drive (except where they form part of other approved school documentation, such as a record of achievement, display, brochure or official website), where they will be monitored by the Designated Safeguarding Lead and Headteacher. Once sorted and edited, images must be transferred to the archive and deleted from other personal and school equipment and temporary storage media.
- 16.23 To maintain security and enable subsequent users to work effectively, images on all personal portable media must be deleted once they have been transferred. Similarly, where cameras have the capacity to save images without the need for a removable card, these must be deleted after use.
- 16.24 Unless specific prior consent has been obtained, members of staff and volunteers must not post school images on personal pages of social networking sites or other websites. The use of images on a BPET school's official Facebook page, website and other approved sites is carefully monitored by the Designated Safeguarding Lead to ensure that it is in line with this policy and parental consent. The age limit for having a Facebook account is 13 and other social networks have similar restrictions. However, parents do not always enforce these restrictions. Staff must be vigilant in respect of any inappropriate use by pupils of school images or their own photographs of school events on social networks and must report any concerns to the Designated Safeguarding Lead.
- 16.25 The Designated Safeguarding Lead is responsible for liaising with the chair of the parents' association (or other delegated member of the association) to ensure familiarity with this policy and that images used on the association's Facebook, Instagram and/or X (formerly Twitter) accounts, and in newsletters and other literature and media abide by this policy and respect the levels of consent given by parents in respect of photography.
- 16.26 Final responsibility for the appropriate use of photography at school and in connection with school events rests with the Headteacher and the child protection officer. They monitor school images and may require an image to be deleted, edited or removed from a particular document, website etc in accordance with the requirements of this policy.
- 16.27 Schools assess the risk of access to archived images by inappropriate individuals to be very low. Staff and volunteers must ensure that their use and storage of images maintains a similarly acceptable level of risk.

17 Domestic abuse

- 17.1 The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

- 17.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.
- 17.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.
- 17.4 Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn.
- 17.5 **Operation Encompass** is a police and education early information partnership, enabling educational settings to offer immediate support to children experiencing domestic abuse. When police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL prior to the start of the next school day. This ensures that the school has up-to-date safeguarding information about the child and can provide immediate support, depending on the wishes of the child.
- 17.6 All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

18 Honour or faith-based abuse

- 18.1 Honour or faith based' abuse (HBA) encompasses actions taken to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing.
- 18.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.
- 18.3 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

18.4 Female Genital Mutilation

- 18.4.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.
- 18.4.2 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as inform the designated safeguarding lead.

18.5 Forced Marriage

- 18.5.1 A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse.
- 18.5.2 Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
- 18.5.3 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.
- 18.5.4 Forced marriage is not the same as arranged marriage, which is common in many cultures.
- 18.5.5 If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

19 Radicalisation and Extremism

- 19.1 BPET is committed to supporting the 'Prevent' strategy in relation to radicalisation, extremism and terrorism, in line with the Prevent Duty 2023.
- 19.2 Extremism is defined as vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process of a person legitimising support for, or use of terrorist violence.
- 19.3 Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism. 'Prevent' is considered carefully in the appointment of new staff, volunteers and contractors, and in the admission of visitors and visiting speakers to the school.
- 19.4 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.
- 19.5 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

20 Staff/pupil relationships

- 20.1 Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18.

- 20.2 We provide our staff with advice regarding their personal online activity and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules.
- 20.3 Our Staff Code of Conduct sets out our expectations of staff and is signed by all staff members.

21 Safeguarding in Sport

- 21.1 The school has established appropriate criteria where children are separated in sport and physical activity according to their biological sex. This guards against discrimination in relation to the Equality Act. The school will work carefully and liaise with parents in relation to supporting the social transition of gender questioning children.
- 21.2 The Equality Act permits circumstances in which children can be separated by gender in relation to engagement in sport and physical activities. This provision applies to participation in any sport or game, or activity of a competitive nature, where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). The school can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.
- 21.3 Some sports may need to be played in single-sex groups from a certain age to ensure children's safety and, where this is the case, there must be no exceptions. In other cases, the school may adopt a policy of single-sex sports for reasons related to fairness.

22 Safeguarding in Boarding and Residential Accommodation

- 22.1 As the school does not have boarding pupils, this area of focus, new to KCSIE 2026, is relevant in relation to the organisation of residential trips and visits.
- 22.2 In accordance with Part 6 of the Equality Act, the guidance sets out that the school:
- 22.2.1 Must not allow a child to share overnight accommodation with a child of the opposite biological sex.
 - 22.2.2 Must consider its duty under the Equality Act, its safeguarding obligations and any other regulations and standards when allocating sleeping arrangements such as dormitories, tents and shared rooms.
 - 22.2.3 Should make alternative arrangements if a child does not want to share a room with another child of the same biological sex.
 - 22.2.4 Should consider the guidance in this policy relating to considering requests for support with social transitioning
 - 22.2.5 Please refer also to the section below on host families.

23 Safeguarding concerns and allegations made about staff, supply staff, contractors, trainee teachers and volunteers

- 23.1 If a safeguarding concern or allegation is made about a member of staff, supply staff, contractor, trainee teacher or a volunteer, or relates to incidents that happened when an individual or organisation was using one of the BPET school premises for the purposes of running activities for children the schools DSL must be informed immediately. The BPET Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers Policy and procedure can be

provided on request and the full procedure for managing such allegations or concerns are set out in Part Four of Keeping children safe in education 2026.

23.2 Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.

23.3 Should an allegation be made against a member of a third party or supply staff working at the school, the school remains responsible for gathering the facts and managing the safeguarding process while working closely with the employment agency or business, which will usually lead on any disciplinary action.

24 Whistle blowing if you have concerns about a colleague

24.1 It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the headteacher of the school. If the complaint is about the headteacher, then this should be reported directly to the headteacher's line manager which will be the schools allocated Education Director (BPET Central Team – Alison Colenso, Director of Education).

24.2 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

24.3 The BPET Whistleblowing Policy is the route directed for staff to raise concerns or make allegations and for an appropriate enquiry to take place.

25 Staff and local governor/trustee training

25.1 Our staff receive appropriate safeguarding and child protection training (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils.

25.2 Part One of Keeping Children Safe in Education should be read and understood by all staff. Annex A is also to be read by school leaders and those who work directly with children.

25.3 New staff and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff code of conduct, how to report and record concerns and information about our Designated Safeguarding Lead and deputy DSLs. The BPET Induction, Probation and ECT Induction Policy sets out further policies for inclusion in induction like the Behaviour Policy, On-line safety, Collection, Non-collection and Missing Child Policy etc.

25.4 Our local governors/trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated annually.

25.5 Our safeguarding governor/trustee receives additional training to empower them to support and challenge the designated safeguarding lead and support the delivery of high-quality safeguarding across the trust.

26 Safer Recruitment

26.1 The BPET Board and our senior leadership team are responsible for ensuring we follow recruitment procedures that help to deter, reject or identify people who might harm children. When

doing so we check and verify the applicant's identity, qualifications and work history in accordance with Keeping children safe in education 2026 and the local safeguarding partner arrangements.

- 26.2 All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.
- 26.3 We ensure that our volunteers are appropriately checked and supervised when in school, along with a risk assessment in place for every volunteer. We check the identity of all contractors working on site and request DBS checks where required by Keeping children safe in education 2026, which now records, in line with the Crime and Policing Act 2026, that regular volunteers are in regulated activity regardless of whether they are supervised, and, therefore, require an enhanced DBS check with barred list. Contractors who have not undergone checks will not be allowed to work unsupervised when pupils are on site.
- 26.4 The facility exists for a member of staff to begin work at the school before the DBS certificate has been seen, provided that certain criteria have all been met (refer to the Safer Recruitment Policy and DBS Risk Assessment for further details). The school is aware that, from 1st September 2026, this facility is no longer applicable for staff, contractors and volunteers who work with children in the EYFS, since the EYFS requirements now state that, for such staff, the DBS certificate must be in place before work starts.
- 26.5 When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers and students on childcare courses undertaking work placements will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.
- 26.6 BPET maintains the single central record of recruitment checks undertaken in each of our schools. [Our safer recruitment policy and procedures](#) can be accessed here.
- 26.7 All staff are expected to report any concern about another member of staff that may meet the 'harm threshold' or that constitutes a 'low-level concern'. Low-level concerns will be managed in line with Part Four of KCSIE 2026.

27 Site security

- 27.1 Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times.

28 Child protection procedures

28.1 Recognising abuse

- 28.1.1 Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.
- 28.1.2 Keeping children safe in education 2026 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

28.2 Taking action

- 28.2.1 Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary call 999
- log the concern on CPOMs and report your concern to the DSL as soon as possible
- share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family

28.3 If you are concerned about a pupil's welfare

- 28.3.1 Staff may suspect that a pupil may be at risk. This may be because the pupil's behaviour has changed, their appearance has changed or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.
- 28.3.2 If the pupil does reveal that they are being harmed, staff should follow the advice below.
- 28.3.3 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

28.4 If a pupil discloses to you

- 28.4.1 If a pupil tells a member of staff about a risk to their safety or wellbeing, the staff member will:
- remain calm and not overreact
 - allow them to speak freely
 - not be afraid of silences
 - not ask investigative questions
 - give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
 - not automatically offer physical touch as comfort
 - let the pupil know that in order to help them they must pass the information on to the DSL
 - tell the pupil what will happen next and give them an opportunity to ask questions about what will happen next
 - log the disclosure on CPOMs and pass it to the DSL as soon as possible
 - report verbally to the DSL even if the child has promised to do it by themselves
 - let the pupil know when they can expect to be updated or receive more information, emphasising that the pupil can talk to them or the DSL at any time

28.5 Notifying parents

- 28.5.1 The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

29 Referral to children's social care

- 29.1 The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any referrals must also be recorded on CPOMs using the parent category 'Referral to Children's Social Care'.

30 Reporting directly to child protection agencies

- 30.1 Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, community-based early help and targeted early help delivered through Family Help, or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies or the head teacher are not available and a referral is required immediately.

31 Universal Services and Community-based Early Help Assessment

- 31.1 Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage. They are not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area. This level of Early Help is provided through universal services and other voluntary and community services. This includes universal services such as education and health services, as well as support delivered through Best Start Family Hubs, youth services, after school clubs and housing provision. Universal services and community-based Early Help means providing extra help and support to children of all ages, young people and families as soon as problems start to emerge, using approaches that promote, strengthen and improve a family's resilience and outcomes or reduce the chance of a problem getting worse. The school aims to work with families in a supportive, non-judgemental way so that trust is built up and the best possible outcomes are achieved. Our Early Help support falls into three broad areas:

31.1.1 General Pastoral Care

31.1.2 Focused Pastoral Care

- 31.1.3 Early Help Assessment - For children, young people and families whose circumstances make them more vulnerable, or where the school requires specialist support to meet a child's needs. Referrals for Early Help should be recorded on CPOMs using the 'Early Help' sub-category of 'Referral to Children's Social Care'.

- 31.2 The school will always involve the family in all Early Help strategies and most will only be put in place with their permission. However, there may be occasions when the school's safeguarding team feel that a child may be at immediate risk of significant harm and that by informing the parents/carers of the concern the child may be put at further risk. If such a case should arise, the school will make an immediate referral to social care without the parents/carer's knowledge.

- 31.3 Some children and families may require more targeted support than that offered at the universal and community based Early Help level. The Families First Partnership (FFP) Programme Guide provides a toolkit to assist safeguarding partners set up effective Family Help models to identify children and families who would benefit from more targeted support through Family Help. Early Help services delivered through Family Help are targeted to address specific concerns within a family. Examples include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Targeted Early Help may be appropriate for children and families who have multiple and/or complex needs. It is voluntary and requires the family's consent.

32 Confidentiality and sharing information

- 32.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead, Deputy Designated Safeguarding Lead or headteacher.

32.2 Sharing information

- 32.2.1 The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for deciding to do so on CPOMs.
- 32.2.2 Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.
- 32.2.3 Information sharing decisions will be recorded on CPOMs, whether or not the decision is taken to share.
- 32.2.4 The UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the BPET Data Protection Officer.

32.3 Storing information

- 32.3.1 Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. BPET schools use CPOMs for recording child protection information about a pupil. It will be stored and handled in line with the BPET Information and Records Retention Policy.
- 32.3.2 Transferring the child protection file to a child's new school should take place within 5 days for an in-year transfer or within the first 5 days of the start of a new term. When deciding what information to share with the receiving school, the school will consider its relevancy and what the receiving setting needs to know. The school will ensure that such information is clearly presented, proportionate and suitably contextualised.
- 32.3.3 When the school receives safeguarding information relating to a child moving into the school, which indicates a risk to that pupils and/or to others, the school will ensure that the risk is carefully assessed and that a safety and support plan is prepared and implemented. This should arise from a conversation between the DSLs from both settings.
- 32.3.4 Our Confidentiality and Information Security Policy and BPET Information and Records Retention Policy is available to parents and pupils on request.

33 Special Circumstances

33.1 Looked after children

- 33.1.1 The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safely. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care. The role of virtual head includes a responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker. In this context, the DSL may have more formal contact with the virtual head for children in care.

33.2 Children who have a social worker

- 33.2.1 Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and promoting the child's welfare.

33.3 Work Experience

- 33.3.1 The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with statutory guidance.

33.4 Children staying with host families

- 33.4.1 The school may make arrangements for pupils to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the statutory guidance to ensure hosting arrangements are as safe as possible.
- 33.4.2 Schools cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where pupils stay with host families abroad we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our Designated Safeguarding Lead will ensure the arrangements are sufficient to safeguard our pupils and will include ensuring pupils understand who to contact should an emergency occur or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.
- 33.4.3 Some overseas pupils or within the UK, may reside with host families during school terms and the school is responsible for vetting the families, through the local authority to check that such arrangements are safe and suitable.

33.5 Private fostering arrangements

- 33.5.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

When a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will tell the DSL and the school will notify the local authority of the circumstances.

33.6 Homelessness

- 33.6.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

34 Policy on Restrictive Intervention; The Use of Reasonable Force and Acceptable Physical Contact

This policy is written with due regard to the April 2026 DfE guidance on Restrictive Interventions, including the Use of Reasonable Force in Schools. The school aims to provide a supportive and controlled environment in which children are enabled to thrive as happy and secure individuals. However, it is recognised that occasionally situations will arise where children place themselves or others in danger through deliberate or thoughtless behaviour, or may be likely to damage property, and where restrictive intervention may be necessary to control or restrain a child's behaviour.

This policy aims

- To protect every person in the school community from harm.
- To protect all pupils against any form of physical intervention that is unnecessary, inappropriate, excessive or harmful.
- To provide adequate information and training for staff so that they are clear as to what constitutes appropriate behaviour and to deal effectively with violent or potentially violent situations.

The policy is to be followed regarding the management of unacceptable behaviour by children, and the use of restrictive intervention, including physical restraint or reasonable force in response to unacceptable behaviour or if a child is in immediate danger. All staff must be aware of its contents and have a clear understanding if they are authorised under the policy to exercise restrictive intervention in appropriate circumstances.

Definitions

Restrictive intervention: a means to prevent, restrict, or subdue movement of the body, or part of the body, of a pupil. 'Restrictive intervention' is the umbrella term to describe both physical and non-physical actions aimed to restrain pupils in different ways. This includes mechanical and chemical restraint and seclusion.

Restraint: a term used in legislation referring to a non-disciplinary intervention which immobilises a pupil or limits their movement. This may or may not include direct physical contact. For example, holding a pupil's arms to their sides or removing a pupil's crutches would both be considered forms of restraint.

Reasonable force: a term used in legislation which includes physical restrictive interventions. All members of school staff have the legal power to use reasonable force in limited circumstances. Reasonable means using no more force than is necessary for the least amount of time, the application of which will depend on the circumstances.

Seclusion: a non-disciplinary intervention involving keeping a pupil confined to a place away from others, and preventing them from leaving either by physical obstruction, blocking, or making them believe they will be punished if they try to leave.

The Children Order 1995, Article 4 of the Education Order 1998, The restrictive interventions guidance noted above, and KCSIE explain the permissible use of reasonable force and clarify powers that already exist in common law.

The guidance in this policy enables teachers and other members of staff in the school, authorised by the Headteacher, to use such force as is reasonable in the circumstances, to prevent a pupil from:

- Committing an offence
- Causing personal injury to, or damage to the property of, any person (including the child him or herself)
- Engaging in any behaviour prejudicial to the maintenance of good order and discipline at the school or among its pupils, whether during a teaching session or otherwise.

A child may be restrained in an appropriate manner by an authorised person when on the premises, or when the authorised person has lawful control or charge of the child concerned elsewhere e.g. on a trip or other authorised out of school activity. Schools with children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties may also find it useful to refer to the government guidance "[Reducing the Need for Restraint and Restrictive Intervention](#)".

Staff Responsibilities

This policy aims to set out clearly the circumstances in which restrictive intervention is acceptable. It is to be followed closely in all regards. Any member of staff who acts outside its guidance may be subject to action under the school's disciplinary policies on the ground of gross misconduct, which can lead to instant dismissal. Anyone dismissed in these circumstances is likely to be barred from working with children in any other establishment or setting.

Holding and Carrying Children

As the school cares for very young children, it is inescapable that there will be many occasions when it is completely appropriate for children to be picked up and carried by a member of staff. Children should not be carried unnecessarily or as a matter of course. Once they are able to walk unaided, they should always be encouraged to do so when moving around the school; if necessary they can be encouraged by an adult holding their hand in support. When a child is picked up, this must always be done by placing the hands under the child's armpits, with the child facing towards the adult. When a child is being carried, he/she should be held so that the adult's forearm is supporting the child's thighs, so that the child may place his/her arms around the adult's neck for support. If the child struggles, kicks or otherwise resists being carried, do not try to restrain them more tightly, but place them back on the ground and find another solution to the problem.

There may also be occasions when a child needs to be picked up or supported, for example due to a special need or disability, or a temporary or permanent physical impairment. Such assistance may be needed, for example, during an emergency evacuation of the school.

Acceptable Physical Contact

It is important that all staff have an unambiguous understanding of the difference between physical contact and physical restraint. It is inappropriate to rule out all forms of physical contact between adults and pupils in the school. In many circumstances, particularly with younger pupils, physical contact is important in providing comfort, reassurance and trust. It is important, therefore, that acceptable parameters for physical contact are understood and followed. Staff should be careful that their actions do not lead to misinterpretation, making themselves vulnerable to accusations of inappropriate contact. In this context, this section should be read in conjunction with the **Staff Code of Conduct**.

General Principles:

- Physical contact should always be a response to the needs of the child, not the adult's and should last only as long as is necessary
- It should take place only with the child's clear consent
- Adults should be aware of any religious or cultural practices or beliefs which may influence whether physical contact is acceptable
- Aspects of the curriculum, such as coaching in sport, music, drama and dance, may be more effectively taught through strategies which involve physical contact. However, these should be undertaken in a public arena, such as a class situation, and not in one-to-one tuition.

The school operates a minimal touch policy (handshakes, high fives, fist bumps); we recognise that there are very rare occasions where physical touch is required at times such as administering first aid; comfort to a severely distressed child; preventing risk of immediate danger or physical threat; to physically restrain children about to harm themselves or others. Aside from such instances, it is not appropriate to use physical touch with children.

For those working within the very young in EYFS a certain amount of natural contact with children is expected to comfort or protect appropriately and within Key Stage 1 & 2 similarly, on occasion. However, the need for this diminishes considerably once pupils reach Key Stage 3 or for those with SEND or additional needs. Hence staff are expected to adhere to the minimal touch policy in relation to the listed circumstances.

Specific Considerations

The administration of first aid or medication may necessitate contact proximate to intimate areas of the body. In such circumstances, administration should be undertaken in a manner which respects the dignity of the patient by someone who is suitably qualified. Except with the youngest children, and thereafter, in accordance with age-appropriate expectations, administration should preferably be undertaken by someone of the same gender and a second adult should be present.

Alternative strategies

There are some situations in which the need for physical restraint is immediate and where there are no equally effective alternatives (e.g. if a pupil is about to run across a road). However, in many circumstances there are alternatives, examples being the use of assertiveness skills such as:

- the 'broken record' in which an instruction is repeated until the pupil complies
- use of a distracter, such as a loud whistle, to interrupt the behaviour (such as a fight) long enough for other methods of verbal control to be effective
- withdrawal of attention (audience) e.g. if an action, such as damage to property, is threatened
- other techniques designed to defuse the situation, such as the avoidance of confrontation, or use of humour (in these cases the incident can be dealt with later when emotions are no longer running high)
- the employment of other sanctions consistent with the school's Positive Behaviour and Exclusion Policy.

Physical Intervention

Physical intervention should avert danger by preventing or deflecting a child's action or perhaps by removing a physical object, which could be used to harm him/herself or others. It is only likely to be needed if a child appears to be unable to exercise self-control of emotions and behaviour. It is not possible to define every circumstance in which physical restraint would be necessary or appropriate and staff will have to exercise their own judgement in situations which arise within the above categories. Staff should always act within the school's Positive Behaviour and Exclusion Policy, particularly in dealing with disruptive behaviour.

Physical intervention should be applied as an act of care and control with the intention of re-establishing verbal control as soon as possible and, at the same time, allowing the pupil to regain self-control. It should never take a form which could be seen as a punishment. Staff are authorised to use reasonable force only in applying physical restraint. KCSIE provides additional guidance that reasonable force may involve either *passive* physical contact, such as standing between pupils or blocking a pupil's path, or *active* physical contact such as leading a pupil by the arm out of the classroom.

When considering the use of reasonable force towards children with SEND or medical conditions, the risks should be carefully considered, and reasonable adjustments made in relation to individual needs. Individual behaviour plans, personal health or medical plans and other forms of proactive behaviour support should be taken into account to reduce the need for reasonable force. This should enable an understanding that some children with SEND may react to distressing or confusing situations by displaying behaviours which may be harmful to themselves and others. Triggers may include pain, sensory overload, unfamiliar situations or environments or feelings of fear and anxiety. In particular, pupils who are non-verbal or find verbal communication challenging may express their needs, discomfort or confusion through actions. This can lead to pupils with SEND being disproportionately subject to the use of restrictive interventions.

Staff should be aware that when they are in charge of children during the school day, or during other supervised activities, they are acting in loco parentis and should, therefore, take reasonable action to ensure pupils' safety and wellbeing. Failure to physically restrain a pupil who is subsequently injured or injures another, could, in certain circumstances, lead to an accusation of negligence. At the same time, staff are not expected to place themselves in situations where they are likely to suffer injury as a result of their intervention.

The school does not have a "no-contact" approach to pupil management, since this may leave staff unable to protect pupils. This information on physical intervention should, therefore, be read in connection with the section on physical contact, above. It is the intention of this policy to allow and support staff to make appropriate physical contact.

Types of Incidents

There is a wide variety of situations in which physical intervention might be appropriate or necessary to control or restrain a child. They will fall into three broad categories:

- a) where action is necessary in self-defence or because there is an imminent risk of injury;
- b) where there is a developing risk of injury to the child or others in the vicinity, or significant

damage to property;

c) where a child is behaving in a way that is compromising good order and discipline.

Examples of situations that fall within one of the first two categories are:

- a child attacks a member of staff, or another child;
- children are fighting;
- a child is engaged in, or is on the verge of committing, deliberate damage or vandalism to property;
- a child is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials or objects;
- a child is running in a corridor or on a stairway in a way in which he or she might have or cause an accident likely to injure him or herself or others.

Reasonable Force

Restraint should always use the minimum amount of physical force as is reasonable in the circumstances to achieve the desired result. There is no legal definition of 'reasonable force', so it is not possible to set out comprehensively when it is reasonable to use force, or the degree of force that may reasonably be used. It will always depend on all the circumstances of the case. There are two relevant considerations:

- the use of force can be regarded as reasonable only if the circumstances of the particular incident warrant it. The use of any degree of force is unlawful if the particular circumstances do not warrant the use of physical force. Therefore, physical force could not be justified to prevent a child from committing a trivial misdemeanour, or in a situation that clearly could be resolved without force.
- the degree of force employed must be in proportion to the circumstances of the incident and the seriousness of the behaviour or the consequences it is intended to prevent. Any force used should always be the minimum needed to achieve the desired result.

All staff who work with children are automatically authorised. Authorisation may be on a permanent or long-term basis because of the nature of the person's job or a short term for a specific event such as a school trip. A register of staff authorised under this policy is maintained.

Practical Considerations

Before intervening physically, a member of staff should, wherever practicable, tell the child to stop, and what will happen if he or she does not. The staff member should continue attempting to communicate with the child throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. A calm and measured approach to a situation is needed and staff should never give the impression that they have lost their temper, or are acting out of anger or frustration, or to punish the child.

Whether it is reasonable to use force, and the degree of force that could reasonably be employed, might also depend on the age, understanding, and sex of the child (see also paragraph above regarding children with SEND).

Application of Force

Physical intervention can take several forms. It might involve staff:

- physically interposing between children;
- blocking a child's path;
- holding;
- shepherding a child away by placing a hand in the centre of the back; or,
- in extreme circumstances, using more restrictive holds.

In exceptional circumstances, where there is an immediate risk of injury, a member of staff may need to take any necessary action that is consistent with the concept of "reasonable force": for example, to prevent a young child running off a pavement on to a busy road, or to prevent a child hitting someone, or throwing something.

Therefore, a member of staff applying force should:

- Tell the pupil what you are doing and why
- Use the minimum force necessary
- Involve another member of staff if possible

- Tell the pupil what s/he must do for you to remove the restraint (this may need frequent repetition)
- Use simple and clear language
- Hold limbs above a major joint if possible e.g. above the elbow
- Relax your restraint in response to the pupil's compliance

In other circumstances staff should not act in a way that might reasonably be expected to cause injury, for example by:

- holding a child around the neck, or in any other way that might restrict the child's ability to breathe;
- slapping, punching or kicking a child;
- twisting or forcing limbs against a joint;
- tripping up a child;
- lifting a child by one or more limbs;
- holding or pulling a child by the hair or an ear;
- holding a child face down on the ground.
- holding the pupil in a way which will restrict blood flow or breathing e.g. around the neck

Therefore, a member of staff should always avoid

- touching or holding a child in a way that might be considered indecent.
- acting in temper (involve another staff member if you fear loss of control)
- involving yourself in a prolonged verbal exchange with the pupil
- attempting to reason with the pupil
- involving other pupils in the restraint

Where the risk is not so urgent the member of staff should consider carefully whether, and if so, when physical intervention is right. Staff should always try to deal with a situation through other strategies before using force. All staff need developed strategies and techniques for dealing with situations that they should use to defuse and calm a situation. In a non-urgent situation, force should only be used when other methods have failed.

That consideration is particularly appropriate in situations where the aim is to maintain good order and discipline, and there is no direct risk to people or property. As the key issue is establishing good order, any action, which could exacerbate the situation, needs to be avoided.

The age and level of understanding of the child are also very relevant in those circumstances. It should never be used as a substitute for good behavioural management.

Action in Self-Defence or in an Emergency

There may be incidents in which action to restrain a child may be taken outside this policy, by someone who has not been explicitly authorised under the policy. Everyone has the right to defend themselves against a physical attack provided they do not use a disproportionate degree of force to do so. Similarly, in an emergency, for example, if a child was at immediate risk of injury or on the point of inflicting injury on someone else, any member of staff would be entitled to intervene. Any incident of this kind should be recorded in the restraints incident record (see below).

Risk Assessment

The Head will ensure that, in relation to specific pupils, where it is judged that incidents requiring the use of force or restraint are likely to occur, staff will risk assess the likely frequency and severity. Heads may also need to make individual risk assessments where it is known that force is more likely to be necessary to restrain a particular child, such as a child with SEN and/or disability, i.e. communication impairments, physical disability, conditions which make them fragile and dependent on equipment. (See also the paragraph regarding children with SEND, above).

If the school becomes aware that a pupil is likely to behave in a disruptive way that may require the use of reasonable force, staff will plan how to respond if the situation arises. Such planning will address:

- management of the pupil (e.g. reactive strategies to de-escalate a conflict, holds to be used if necessary)
- involvement of parents to ensure that they are clear about the specific action the school might

need to take

- briefing of staff to ensure they know exactly what action they should be taking (this may identify a need for training or guidance)
- identification of additional support that can be summoned, if appropriate.

After the incident; Recording and Reporting

The school has a procedure for the recording of each significant incident of restrictive interventions. Such intervention can occur in response to highly-charged, emotional situations and there is a clear need for debriefing after the incident, both for the staff involved and the pupil. A member of the SLT must be informed of any incident as soon as possible, who will ensure that the incident is recorded as soon as is practicable, ideally on the same day. He or she will take or delegate responsibility for making arrangements for debriefing once the situation has stabilised. An appropriate member of staff should always be involved in debriefing the pupil involved and any victims of the incident should be offered support. Parents/carers of the pupils involved, both as a recipient of a restrictive intervention and as a victim of the incident must be informed on the same day by the headteacher (see also below). There is an exception to the requirement to inform the parents/carers of the pupil who was subject to the restrictive intervention if it appears to the staff member that doing so would be likely to result in serious harm to the pupil. In this instance, the staff member must report the incident to any parent(s) who it can be reported to without resulting in significant harm or, if there are none, to the local authority within whose area the pupil is ordinarily resident.

The member of staff involved and any adult witnesses must make their own record of the incident. This should be completed on the same day as the incident and passed to the Headteacher and/or the member of SLT who is overseeing the response to and formal recording of the incident. The requirement to record applies even if the use of restrictive interventions in certain circumstances is agreed with parents as part of a pupil's behaviour support plan. The Safeguarding Governor must also be informed. The purpose of recording is to ensure that policy is followed, to inform parents, to inform future planning, to prevent misunderstanding or misinterpretation of the incident and to provide a record for any future safeguarding enquiry. The formal report must be sufficiently detailed so that, in the event of any future investigation or complaint, a full record is available. It must contain, as a minimum:

- names of pupil(s) and staff directly involved
- any relevant needs or circumstances of the pupil(s), including whether the pupils involved have an identified special educational need or disability and their SEN status code
- time, date, location and approximate duration of the intervention
- brief account of the incident, including what led up to the incident, identified or potential triggers if known, any preventative or de-escalation strategies used, and (where relevant) what type of reasonable force was applied, the degree of force, and details of any physical injuries sustained
- brief account of why the use of force was assessed as necessary in that instance
- any post-incident support, such as details of any medical treatment for injuries or other adverse impacts.
- A record of when parents/carers were informed and by whom.

Witness records of the incident will be retained alongside the formal report. The school may also record additional details to support the evaluation of incidents, in order to identify best practices and areas for improvement. The headteacher (or, in his/her absence, a member SLT) will contact the parents of the child who was the subject of physical restraint or reasonable force about the incident, on the same day, or as soon as is reasonably practicable, to inform them of the actions that were taken and why, and to provide them with an opportunity to discuss it.

The reporting to parents/carers must be in writing and should include, as a minimum:

- time, date, location and approximate duration of the intervention
- brief account of why the intervention was assessed as necessary in that instance
- brief account of what type of force was applied, and the degree of force
- details of any physical injuries sustained, if applicable.

The school will consider inviting parents/carers to have a follow-up discussion about the incident where appropriate. This could involve a discussion about:

- any behavioural triggers or warning signs of an impending incident
- whether any agreed behaviour support plans were followed
- what de-escalation strategies were used and how effective they were
- what might be done differently in the future

The school may use this information to amend any existing behaviour support plans, as needed.

If the behaviour is part of an ongoing pattern, it may be necessary to address the situation through the development of a personal behaviour plan, which may include an anger management programme, or other strategies agreed by the SENCO. The school will also consider any triggers precipitating the incident to explore ways in which future incidents can be avoided.

Data Analysis

The school's leadership will, periodically, undertake a review over time of incidents of restrictive intervention, to analyse emerging patterns and trends and identify any possible strategies for improvement, particularly in minimising the need for restrictive intervention. The governors and Education Director will also regularly review and interrogate data on restrictive interventions to ensure school leaders:

- identify and implement improvements to policies and practices, particularly where approaches have been used for some time but have not been effective
- identify areas of learning and development for school staff, supporting specific departments and teachers to improve understanding and practice
- understand pupils' repeat patterns and triggers to interrogate the effectiveness of pupil support measures, share this information with teachers who work with those pupils to better support them and, where appropriate, their parents, to establish a behaviour support plan or revise an existing plan.
- identify any disproportionate use of restrictive interventions in relation to pupils who share protected characteristics, have SEN, or other types of vulnerability.

Corporal Punishment

Any form of physical restraint or physical contact which is intended as a punishment is expressly forbidden. This includes such obvious actions as shaking, slapping, punching or otherwise striking a child with the intention of causing pain or discomfort. It will also include less obvious forms of physical actions, such as gripping parts of a child's body or limbs tightly or twisting limbs etc. It can be a matter of degree between acceptable actions to restrain a child and the same physical actions becoming unacceptable and unreasonable force intended to inflict pain or discomfort as a sanction. Staff must ensure that, in the heat of the moment, they do not stray over that divide. Any act of corporal punishment by a member of staff will be considered gross misconduct.

Also unacceptable is any action by a member of staff which, although stopping short of physical contact, is intended to be intimidatory, or has that effect. Such actions would include throwing objects at children, using abusive or threatening language, making threatening gestures or adopting an aggressive manner towards a child. The latter would include shouting at a child or using a raised voice in a threatening manner.

35 Vetting visiting speakers

35.1 The school is aware of the potential risk to children through exposure to views of visiting speakers whose presentations may include material of an extremist nature or which contradicts the school's commitment to provide pupils with a balance of opposing political views. Accordingly, the school undertakes a range of measures to vet the content of presentations by visiting speakers. The level of checking will be determined by an assessment of the likely level of risk and may include the following measures;

- The visiting speaker will be asked to provide assurance that the content of the presentation does not include material of a radicalising or extremist nature and is not in any other way inappropriate for the pupils involved.

- Presentations, such as a PowerPoint, will be required in advance and will be checked by the member of staff responsible and discussed with the speaker
- Visiting speakers will always be accompanied. A member of staff will attend presentations to pupils and will be prepared to intervene, should the content stray from agreed expectations
- An appropriate level of checks, including an identity check, will be undertaken on visiting speakers, particularly any not previously known to the school. Most speakers will be well known to the school (parents, local professionals, religious leaders) and the school will be familiar with their standing and reputation. Where a speaker represents an organisation, for example, the fire service or a charity, identity checks will include verification of the speaker's connection with the organisation.
- The school's vetting procedures may include an internet search to check for links with inappropriate organisations or the expression of extremist views which would indicate that it would be inappropriate to address pupils at the school.

35.2 The above procedures apply at an appropriate level, to all situations where visitors present to the pupils, not simply formal talks, but also the more informal visits to class, covering topics from dental care to Diwali. The procedures are also followed where speakers visit at the invitation of pupils. Any such pupil invitation must be approved by a member of the SLT.

End

Appendix One - Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff are also aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.

1 Physical abuse

Physical abuse is a form of abuse which 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.

35.3 Indicators of physical abuse

The following may be indicators of physical abuse:

- have bruises, bleeding, burns, bites, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- An injury that is not consistent with the account given
- Symptoms of drug or alcohol intoxication or poisoning
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

36 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It 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. It may include verbal abuse such as persistent criticism, belittling or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

36.1 Indicators of emotional abuse

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Inappropriate emotional responses, fantasies
- Self-harm
- drug or solvent abuse
- Running away
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis

37 Sexual abuse

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. They may also include 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

37.1 Indicators of sexual abuse

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Aggressive behaviour including sexual harassment or molestation
- Reluctance to undress for PE or swimming
- Anal or vaginal discharge, soreness or scratching
- Bruises or scratches in the genital area
- Reluctance to go home
- Refusal to communicate
- Depression or withdrawal
- Isolation from peer group
- Eating disorders, for example anorexia nervosa and bulimia
- Self-harm
- Substance abuse
- Acquire gifts such as money or a mobile phone from new 'friends'

38 Neglect

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, for example, 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); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

38.1 Indicators of neglect

The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food
- Frequent tiredness
- Frequently dirty or unkempt
- Poor attendance or often late
- Poor concentration
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones or to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is left at home alone or with inappropriate carers

Appendix Two - Related Safeguarding policies

- Staff Code of Conduct
- Behaviour and exclusions
- Complaints
- Anti-bullying
- Whistleblowing
- Special Educational Needs
- Collection, Non-Collection and Missing Child Policy
- Safer Recruitment
- Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers.
- Grievance and disciplinary.
- Searching, Screening and Confiscation Policy