



Child Protection and Safeguarding Policy

This Child Protection and Safeguarding Policy applies to all employees, volunteers and clients of the BGC Education Group, including Register Recruitment and Inclusive Mentoring.

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Date of Next Review: 1st September 2027 (reviewed annually)

At BGC Education Group, we are committed to providing specialist 1:1 Tuition, Mentoring, Staffing Solutions, Coaching and Education Guidance for a range of education settings and local authorities.



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PART 1: Policy

1.1 Definitions

Safeguarding is defined as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and taking action to enable all children to have the best outcomes;

Child Protection is defined in the Children Act 1989 (s.47) as when a child is suffering, or is likely to suffer significant harm. Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

1.2 Introduction

At BGC Education Group

- Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children, their families and carers, has a role to play.
- In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
- We take an '**it can happen here**' approach where safeguarding is concerned.
- **Everyone** who comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action.



BGC Education Group is committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children can learn;
- Acting on concerns about a child's welfare immediately;
- Fulfilling our legal responsibilities to identify children who may be in need of early help or who are suffering, or are likely to suffer, significant harm.
- Being clear that when commissioned by a school to work with a child, their procedures are adhered to.

All action taken by BGC Education Group will be in accordance with:

- **Current legislation** (these are summarised within ([Working together to safeguard children - GOV.UK](#)))
- **Statutory, national and local guidance – this includes:**
 - **Working Together to Safeguard Children (2023)**, which sets out the multiagency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
 - **Keeping Children Safe in Education (2026)** is statutory guidance issued by the Department for Education which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- **Local Guidance from the Local Safeguarding Partnership:** around particular safeguarding topics are available on the [Keeping Bristol Safe Partnership Website](#) and the [North Somerset Safeguarding Children Partnership](#) or [South Gloucestershire Children's Partnership](#).
- **Government guidance issued in relation to:**
 - **Topical safeguarding issues** – a collection of these resources can be found on the above LSCB websites



This policy should be read in conjunction with the following policies:

- Recruitment Policy
- Code of Conduct for Staff
- For mentoring – each separate SLA.

1.3 Equalities Statement

With regards to safeguarding we will consider our duties and rights under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. General duties include:

1. Eliminate discrimination, harassment, victimisation and other conduct that is prohibited by the Equality Act 2010.
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
3. Foster good relations across all protected characteristics – between people who share a protected characteristic and people who do not share it.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND).

BGC also adheres to the principles or and promotes anti oppressive practice in line with the UN Conventions of the Rights of the Child and the Human Rights Act 1998.

1.4 Overall Aims

This policy will contribute to the safeguarding of children within BGC Education Group and partner organisations by:

- Clarifying safeguarding expectations for members of the education setting's community, staff, children and their families;
- Contributing to the establishment of a safe, resilient and robust safeguarding culture in the setting where we are working, by having shared values; that learners



are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice, and are listened to.

- Supporting contextual safeguarding practice recognising that the setting's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the setting's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents and other agencies in the Local Safeguarding Partnership.
- Ensuring all policies which address issues of power and potential harm, for example anti-bullying, equalities, use of reasonable force, positive behaviour, will be linked to ensure a whole school approach.

1.5 Professional expectations, roles, and responsibilities

Role of all staff

- All staff will read and understand Part 1 of statutory guidance Keeping Children Safe in Education. Those working directly with children will also read Annex B.
- In addition to this all staff will be aware of the systems in place which support safeguarding including; reading this Safeguarding/Child Protection Policy; the Behaviour Policy; the Staff Behaviour Policy (code of conduct); safeguarding response to children who go missing from education; and the role of the Designated Safeguarding Lead (DSL).
- Know who and how to contact the DSL and any deputies.
- All staff will be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
 - who need a social worker and may be experiencing abuse or neglect
 - requiring mental health support,
 - may benefit from early help



- where there is a radicalisation concern
- where a crime may have been committed
- Be clear as to the setting's policy and procedures with regard to child on child abuse, and those requiring mental health support.
- Be involved, where appropriate, in the implementation of individual plans to further safeguard and achieve best outcomes for learners.
- Record concerns appropriately and in a timely manner by using the setting's safeguarding systems.
- Are aware of the need to raise to the senior leadership team any concerns they have about safeguarding practices within the school.

Role of the Designated Safeguarding Lead (DSL)

Duties are further outlined in Keeping Children Safe in Education (Annex C)

Details of our DSL and Deputy DSL are available on the BGC Education Group website.

- The DSL is a senior member of staff who undertakes lead responsibility for safeguarding and child protection within the organisation and this responsibility is explicit in the role holders job description.
- Activities include the management of work undertaken by any Deputy DSLs.
- Manages early identification of vulnerability of learners and their families from staff through cause for concerns or notifications. This will ensure detailed, accurate, secure written records of concerns and referrals.
- Manages referrals to local safeguarding partners where learners with additional needs have been identified. These can include those –
 - who need a social worker and maybe experiencing abuse or neglect
 - requiring mental health support,
 - who may benefit from early help
 - where there is a radicalisation concern
 - where a crime may have been committed
- DSLs will inform the headteacher/principal of enquiries under s.47 of the Children Act 1989 and any police investigations. This includes the need to be aware of the



requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

The DSL will also:

- Work with others – acting as a point of contact for outside agencies with regard to safeguarding.
- Support and advise other staff in making referrals to other agencies
- When required, liaise with the case manager and the Local Authority Designated Officer (LADO) in relation to child protection cases which concern a staff member.
- Help promote educational outcomes by sharing information about vulnerable learners with relevant staff. This includes ensuring that staff:
 - know who these children are,
 - understand their academic progress and attainment and maintain a culture of high aspirations for this cohort;
 - are supported to identify the challenges that children in this group might face
 - make reasonable adjustments so that they act to best support children who have had, or have ever had, a social worker.
- Ensure a prompt and successful transfer of the Safeguarding/Child Protection File when a learner moves on to a new setting.
- Ensure appropriate safeguarding cover and availability during term time/ any out of hours/out of term activities managed by the school.

1.6 Safeguarding training for staff

All staff:

- Directors will ensure that all staff members undergo safeguarding and child protection training at induction.
- Will receive appropriate safeguarding and child protection training, which is regularly updated.



- All staff must complete FGM awareness training and will understand their legal duty under the Mandatory Reporting Duty.
- All staff must complete PREVENT awareness training. This is to ensure that they are able to comply with the legal expectations under the PREVENT duty.
- In addition, **all** staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively (KCSIE).
- Staff training includes clear reference to internal whistleblowing policy and guidance for escalating concerns.

Training for DSLs and deputies:

- Will undergo formal training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years.
- Deputies will be trained to the same level as the DSL.
- The DSL and any deputies will liaise with Local Safeguarding Boards to ensure that their knowledge and skills are updated via e-bulletins, attend DSL network meetings and take time to read and digest safeguarding bulletins.

Other training considerations:

- The Directors will ensure that at least one person on any appointment panel will have undertaken safer recruitment training, in line with [The School Staffing \(England\) Regulations 2009](#)
- Training around safeguarding topics in Annex B (including online safety) will be integrated, aligned and considered as part of the overarching safeguarding approach.
- Appropriate colleagues have received appropriate training in relation to use of reasonable force and positive handling.

1.7 Safeguarding in the curriculum



BGC Education Group is dedicated to ensuring that learners are taught about safeguarding, including online safety. We recognise that a one size fits all approach may not be appropriate for all learners and a more personalised approach may be needed for learners with SEN or vulnerabilities. This is part of a broad and balanced curriculum, BGC services do not for the totality of a child's educational offer and will contribute to this balanced curriculum. Where commissioned work includes, we will:

This includes:

- Appropriate filters and monitoring systems are in place to ensure that 'over-blocking' does not lead to unreasonable restrictions as to what learners can be taught with regard to online teaching and safeguarding.
- The curriculum will be shaped to respond to safeguarding incident patterns in the setting identified by the DSL and safeguarding team (e.g., to respond to an increase in bullying incidents).
- Providing engagement opportunities with parents and carers to consult on key aspects of the curriculum.
- Learners have the opportunity to inform the curriculum via discussions with the school council and student body.

1.8 Safer recruitment and safer working practice

Safer recruitment

BGC Education Group pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education, including January 2021 updates regarding leaving the European Union.

- This includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.
- It also includes undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity.



- References are always obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed.
- All recruitment materials will include reference to BGC Education Group's commitment to safeguarding and promoting the wellbeing of learners.
- Where an applicant has worked outside the UK, BGC Education Group will take further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available criminal records check's for overseas applicants, a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC.
- In addition, as part of the shortlisting process, BGC Education Group will consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the setting might want to explore with the applicant at interview.

Use of reasonable force

- 'Reasonable force' refers to the physical contact to restrain and control children using no more force than is needed'. The use of reasonable force is down to the professional judgement of the staff member concerned and will be determined by individual circumstances and the vulnerability of any child with Special Educational Needs or Disability (SEND) will be taken into account.
- The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation and will follow government guidance ([Use of Reasonable Force in Schools 2013; Reducing the need for restraint and restrictive intervention, 2019](#)).
- There is robust recording of any incident where positive handling or restraint has been used. Further review of the incident is carried out to reflect on how the incident could be avoided. This will involve the child and their family.



The process around how the setting manages concerns where a professional may pose a risk to learners and our response to low level concerns can be accessed in section 2.8 Allegations of abuse made against professionals.

Whistleblowing procedures

- Staff are aware of the following whistleblowing channels for situations where they feel unable to raise an issue with the senior leadership team or feel that their genuine concerns are not being addressed:
- General guidance can be found at: Advice on whistleblowing <https://www.gov.uk/whistleblowing>.
- The NSPCC whistleblowing helpline is available [here](#) for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

1.9 Key safeguarding areas

In addition to the above, there are specific areas of safeguarding that the setting has a responsibility to address - these include:

- Children in the court system – Guidance to support children is available
 - [Young witness booklet for 5 to 11 year olds - GOV.UK \(www.gov.uk\)](#)
 - [Young witness booklet for 12 to 17 year olds - GOV.UK \(www.gov.uk\)](#)
- Child Exploitation – both Child Sexual Exploitation and Child Criminal Exploitation
- Domestic Abuse -
- Homelessness
- So-called Honour based Abuse including:
 - Female Genital Mutilation -
 - and Forced Marriage,
- Online Safety
- Mental health
- Child on child Abuse:
 - Bullying and Cyberbullying,



- Consensual and non-consensual sharing of nudes or semi-nude pictures or videos, known as youth produced sexual imagery,
 - Physical Abuse,
 - Sexual Violence, Sexual Harassment,
 - Sexting,
 - Causing someone to engage in a sexual act without their consent,
 - Up skirting,
 - Initiation and Hazing Type violence,
 - Abuse in intimate personal relationships between children (also known as teenage relationship abuse).
- Serious Youth Violence
 - Substance Misuse
 - Preventing Radicalisation
 - Private Fostering
 - Young Carers
 - Children missing from Education – Including persistent absence
 - Cybercrime
 - Forced Migration

Additional information about key safeguarding areas can also be found in Keeping Children Safe in Education (KCSIE) - Annex B; or the [NSPCC website - Types of Abuse](#).

PART 2: Procedures

2.1 Reporting concerns

All staff are clear about recording and reporting concerns to the DSL and deputies in a timely way. In the case a child is in immediate danger in staff should phone the police.

All staff are aware of and follow the procedures to respond to a concern about a child detailed in [Appendix B](#). This includes responses to child-on-child harm and children who present with a mental health need.



At BGC Education Group learners can raise their concerns via, their key adult and they will be treated seriously.

Where staff are working with students and they are commissioned by a school, the schools procedures will be adhered to, BGC will also be notified and joint working will commence.

2.2 Information Sharing

BGC Education Group is committed to have due regard to relevant data protection principles which allow for sharing (and withholding) personal information as provided for in the Data protection Act 2018 and General Data Protection Regulations. This includes how to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'.

Staff at the setting are aware that:

- That 'Safeguarding' and 'individuals at risk' is a processing condition that allows practitioners to share special category personal data.
- Practitioners will seek consent to share data where possible in line with Information Sharing for Safeguarding Practitioners 2018.

There may be times when it is necessary to share information without consent such as:

- To gain consent would place the child at risk,
- It cannot be reasonably expected that a practitioner gains consent,
- or, if by sharing information it will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent.

There are also times when the BGC Education Group will not provide pupil's personal data where the serious harm test under legislation is met, (by sharing the information the child may be at further risk). When in doubt the BGC Education Group will seek legal advice.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.



2.3 Identifying and monitoring the needs of vulnerable learners.

The DSL and DSL deputies will regularly review and monitor those students who have been identified as vulnerable. This can include reviewing attendance data, behaviour data, attainment data and safeguarding records.

This is to ensure that:

- Proportionate and early interventions can be taken to promote the safety and welfare of the child and prevent escalation of harm.
- Information about vulnerable learners is shared with teachers and school and college leadership staff to promote educational outcomes.
- Reasonable adjustments are made in relation to school-based interventions – for example responding to behaviour.
- Students who have or have had a social worker are given extra support to reach their full potential.
- Those with protected characteristics are likely to be more vulnerable to negative experiences of discrimination both explicitly and or systemically. As such, BGC Education Group will work in the best interests of the child in compliance with their equality and human rights legal duties

2.4 Multi-agency working

BGC Education Group will work together with appropriate agencies to safeguard and promote the welfare of children including identifying and responding to their needs. This is in compliance with statutory guidance Working Together to Safeguard Children 2023.

Occasions that warrant a statutory assessment under the Children Act 1989:

- If the child is in need under s.17 of the Children Act 1989 (including when a child is a young carer and or subject to a private fostering arrangement);
- or if the child is in need of protection under s.47 of the Children Act 1989 where they are experiencing significant harm, or likely to experience significant harm.



Referrals in these cases should be made by the DSL (or Deputy) to Children's Social Care in the local authority in which that child resides. The list of safeguarding contact and other key agencies are listed in Appendix B.

Where the child already has a social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager. If the child is a child in care, notification should also be made to the Hope Virtual School.

We will co-operate with any statutory safeguarding assessments conducted by children's social care: the setting will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings initial and review child protection conferences and core group meetings.

If professionals disagree about outcomes and decisions they must follow local safeguarding board escalation procedures. These are available at each LSCB website:

- [kbsp-childrens-escalation-procedure.pdf](#)
- [BCSSP Escalation Procedure](#)

Any time an escalation procedure is used records must be made by the DSL at the school.

Additional considerations:

- Where a child and/or their family is subject to an inter-agency child protection plan or a multiagency risk assessment conference (MARAC) meeting, the setting will contribute to the preparation, implementation and review of the plan as appropriate.
- In situations where a child in care may be put on to part time timetable, the school will consult with the Hope Virtual School and complete the pro-forma found at <https://www.bristol.gov.uk/schools-learning-early-years/resources-professionals/attendance-and-exclusions>
- If a crime has been suspected or committed that involved the bringing of an offensive weapon on to the school site, the setting will liaise with the Local Authority Violence Reduction Unit (Safer Connections) who will consider a proportionate response.
- If there is a risk of harm, the police should be called via 999. For other concerns of criminality the non-statutory guidance 'When to Call the Police' from the NCPCC can



be helpful or contact your neighbourhood policing team [Your area | Avon and Somerset Police](#).

- In the rare event that a child death occurs or a child is seriously harmed, BGC Education Group will notify the LSCB soon as is reasonably possible.

2.5 Suspension, Exclusions and commissioning of Alternative Provisions

When the setting is considering suspending or permanently excluding a learner where additional vulnerability is identified it is important that the learner's welfare is a paramount consideration.

BGC Directors will contact the on roll school to make a joint decision on the situation.

BGC Education Group will exercise their legal duties in relation to their interventions. This includes:

- Whether a statutory assessment should be considered in line with the principles of Children Act 1989
- That decisions are made in an anti-discriminatory manner in line with the Equality Act 2010 (including having regard to the SEND Code of Practice)
- and takes into consideration the learner's rights under the Human Rights Act 1998.

2.5.1 - Actions to take

An assessment of need should be undertaken with multi-agency partners with a view to mitigate any identified risk of harm this in line with 2.3 Identifying and monitoring the needs of vulnerable learners.

- If the child is subject to a child protection plan or where there is an existing child protection file, we will call a multiagency risk-assessment meeting prior to making the decision to exclude.



- In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment must be completed prior to convening a meeting with the governing body.

2.6 Children Missing from Education

A child going missing from education is a potential indicator of abuse or neglect.

Staff should follow the setting's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. These should be reported to the DSL and reviewed in line with 2.3 Identifying and monitoring the needs of vulnerable learners

BGC Education Group will inform the local authority:

- of any pupil who fails to attend school regularly,
- or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

The school should follow the guidance detailed in Children Missing Education (2016).

2.7 Respond to incidents of child on child harm.

(There is flow diagram in Appendix B that illustrates this section)

All staff should recognise that children are capable of abusing other peers (including online). Issues of learners hurting other learners have traditionally been dealt with under processes outlined in settings' behaviour policies. It is important that child on child harm should be considered as a safeguarding issue.

This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.



At BGC Education Group:

- Incidents are taken seriously. These will never be tolerated or passed off as 'banter', just having a laugh' or 'part of growing up'.
- Banter and teasing can and should be acknowledged and recognised as bullying behaviour and may require proportionate intervention.
- It is understood that child on child harm may reflect equality issues in terms of those who may be targeted are more likely to have protected characteristics.

It is important that incidents of harm are treated under safeguarding policy and process and records will be kept on the child's safeguarding/child protection file.

BGC Education Group is committed to undertaking the following:

- Early identification of vulnerability to child on child harm by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.
- Securing the immediate safety of learners involved in an incident and sourcing support for other young people affected.
- If a disclosure is made – staff will listen carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- Those who experience abuse will never be given the impression that they are creating a problem by reporting, nor will those who experience abuse ever be made to feel ashamed for making a report.
- The child's wishes are taken into consideration in any intervention and any action is taken to ensure safety of the target and other members of the wider peer cohort.
- The need to not promise confidentiality should be considered as it is very likely that information will need to be shared with others.
- When an incident of sexual violence and sexual harassment occurs, reference to Part 5 of Keeping Children Safe In Education 2023 should be made in relation to taking protective action. These incidents must be reported immediately to the DSL/ Deputy DSL who will undertake further assessment of what action should be taken proportionate to the factors that have been identified. The Brook - Sexual Behaviours Traffic Light Assessment Tool should be utilised to inform assessment of



risk and what actions to subsequently take. This may include seeking specialist advice and guidance from Be Safe.

- DSLs/Deputies will consider whether a case can be managed internally, through early help, or should involve other agencies as required in line with the section 2.4 - Multi-Agency Working section.
- When the children involved require a statutory assessment either under s.17 or s. 47 of the Children Act 1989 a referral to social care should be made for all children directly involved.
- Where the report includes an online element, being aware of searching, screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.
- If the incident constitutes towards a criminal offence, the setting will liaise with the police. If this this may also involve the Lighthouse team (Safeguarding Unit) of Avon and Somerset Police.
- Risk assessments will be developed for individual children who have been involved in an incident. This should be reviewed every 3 months or every time there is an occurrence of an incident. These should involve the child and parents/carers.
- DSL and Deputy DSL(s) will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.

Contextual safeguarding approach to child on child harm:

BGC Education Group will minimise the risk of child on child abuse by taking a contextual approach to safeguarding by increasing safety in the contexts of which harm can occur – this can include the school environment itself, peer groups and the neighbourhood.

Following any incidents of child on child harm, the DSL/Deputies will review and consider whether any practice or environmental changes can be made in relation to any lessons learned. This can include making changes to staffing and supervision, making changes to the



physical environment and considering the utilisation and delivery of safeguarding topics on the curriculum.

2.8 Responding to allegations of abuse made against professionals.

BGC Education Group has processes and procedures in place to manage any safeguarding allegation, or concern (no matter how small), about staff members (including supply staff, volunteers, and contractors). Staff must report any concerns or allegations about a professional's behaviour, but more urgently where they may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Immediate action must be taken – do not speak to the individual it concerns.

- Allegations or concerns about colleagues (including supply staff) and visitors must be reported directly to the Head Teacher/CEO or line manager.
- If the concern relates to Head Teacher/CEO it should be reported to the Chair of Governors, who will liaise with the Local Authority Designated Officer (LADO) and they will decide on any action required,

BGC Education Group will follow guidance in KCSIE - Part four: Allegations of abuse made against teachers and other staff.

- If concerns relate to the head teacher who is the sole proprietor of an independent school, allegations should be referred to the LADO.
- Allegations regarding foster carers or anyone in a position of trust working or volunteering with children should be referred to the LADO on the day that the



allegation is reported. The allocated social worker should also be informed on the day. The school should not undertake any investigation unless the LADO advises this.

Low Level Concerns

Should be read in conjunction with the Staff Code of Conduct and KCSIE Part 4.

Low level concerns are not insignificant, this process should be used in event where a concern about a professional does not meet the threshold set out at the beginning of this section:

- Reports should be made to one of the company Directors.
- The Director will address unprofessional behaviour and support the individual to correct this behaviour at an early stage providing a response that is sensitive and proportionate.
- Records of low-level concerns are stored on the staff members personal file.
- Low Level concerns are resolved or escalated by the most appropriate manager or HR.

2.9 Mental health and wellbeing.

(A flow diagram is available in [Appendix B](#) to illustrate this section)

BGC employees have an important role to play in supporting the mental health and wellbeing of their learners. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

BGC Education Group will commit to undertake the following:

- Early identification of vulnerability to mental health problems by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.
- Staff will follow a safeguarding process in terms of reporting concerns outlined in [Appendix B](#) so the DSL and deputy DSLs can assess whether there are any other vulnerabilities can be identified.



- Staff will ensure the immediate health and safety of a learner who is displaying acute mental health distress. This may require support from emergency services via 999 if the learner is at risk of immediate harm.
- DSLs/Deputies will consider whether a case can be managed internally, through early help, or should involve other agencies as required in line with section 2.4 - Multi-Agency Working.
- The setting will communicate and work with parents to ensure that interventions are in the best interests of the child.
- DSLs will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem – DSLs and the senior leadership team should be able to access specialist advice through targeted services or through their locality Primary Mental Health Specialists from Child and Family Consultation Services.

2.10 Online Safety

Online safety is an integrated and interwoven theme with other safeguarding considerations. It is essential that the DSL takes a lead on ensuring that interventions are effective. This means coordinating support and engaging with other colleagues in the setting who may have more technological expertise such as the IT manager.

BGC is committed to addressing online safety issues around content, contact, conduct and commerce. This includes:

- The effectiveness of the setting's ability to safeguard learners in respect to filtering and monitoring, information security and access management alongside the above will be reviewed annually in line with the digital and technology standards in schools and colleges Meeting digital and technology standards in schools and colleges - <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>



Appendix A – Key Guidance for safeguarding issues.

All key single agency policies relevant for education settings can be found on the following webpage:

<https://bristolsafeguarding.org/policies-and-guidance/education/>

Other multi-agency guidance and policies from the Local Safeguarding Partnerships:

- For Bristol - <https://bristolsafeguarding.org/policies-and-guidance/>
- For South Glos - <http://sites.southglos.gov.uk/safeguarding/library>
- For BANES - [Bath & North East Somerset Community Safety and Safeguarding Partnership \(BCSSP\) \(BathNES\) - Children Policies & Procedures](#)

Appendix B – Reporting concerns

Reporting Concerns Flow Chart - **Bristol**– [Click here](#)

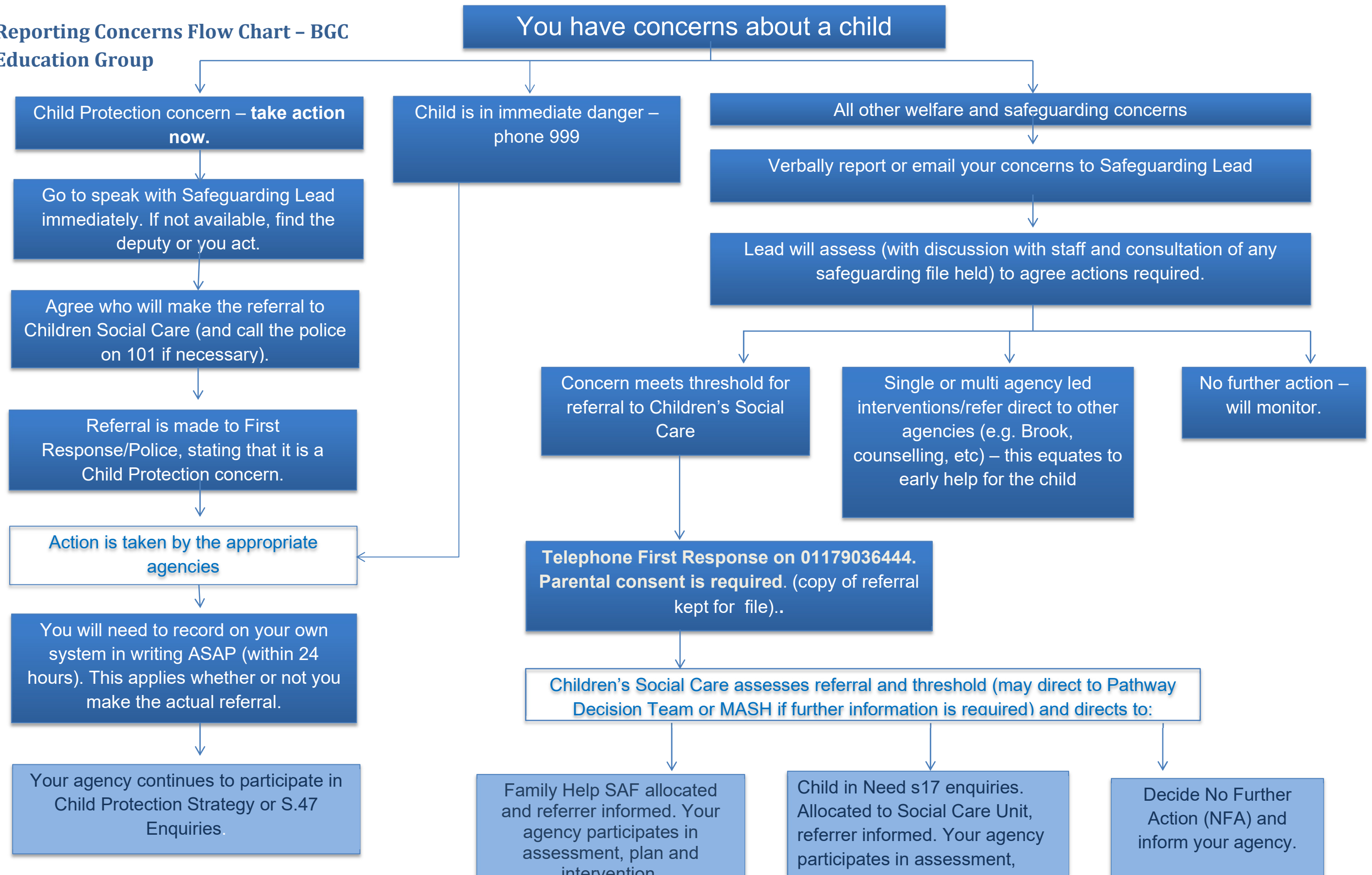
Reporting procedures and contacts BANES – [Click Here](#)

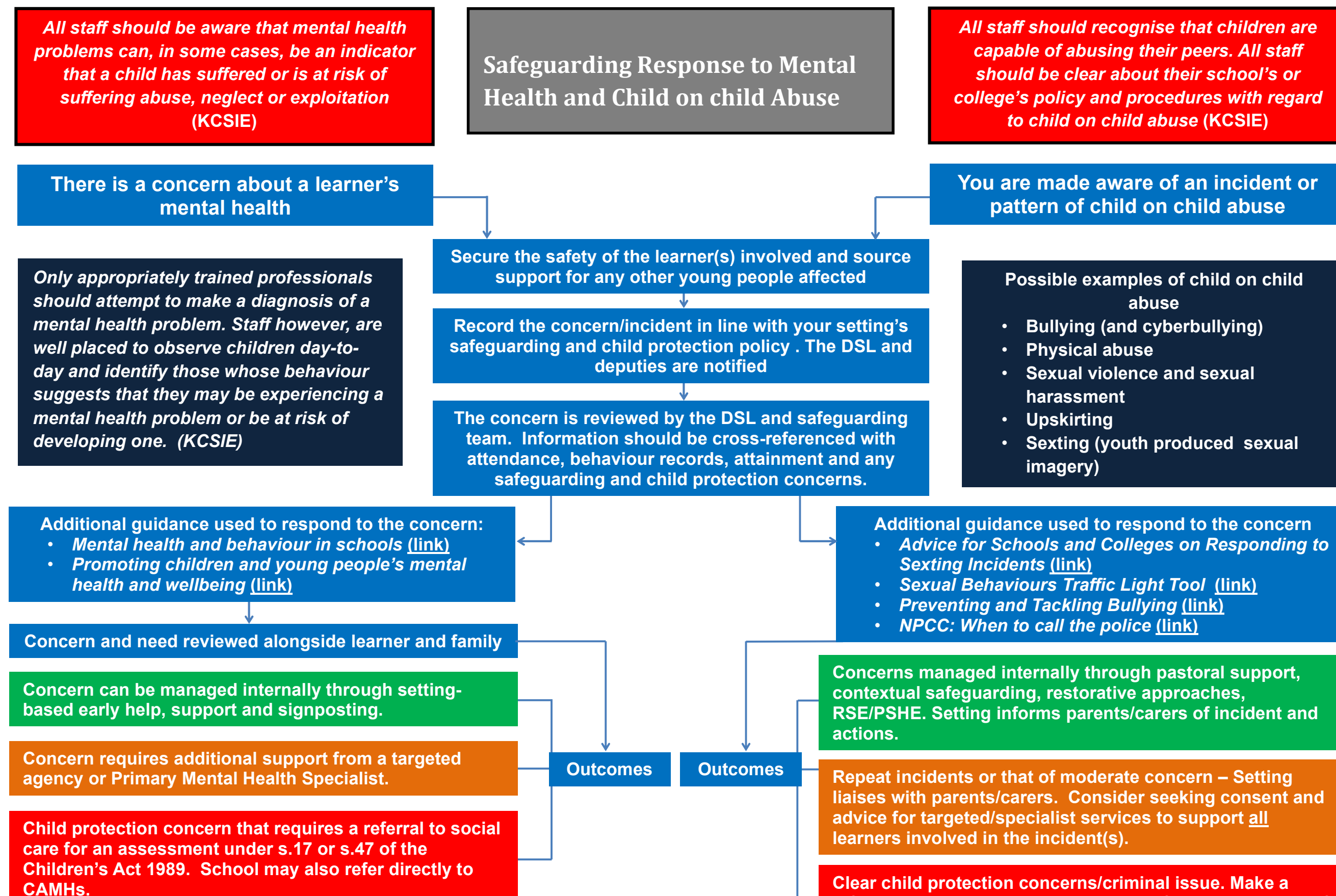
Process flow chart responding to incidents of Child on child incidents and Mental Health Problems – [Click here](#)

Safeguarding contacts Poster – Multi-agency contacts in Bristol. – [Click here](#)

Neighboring Local Authority Contacts - [Click here](#)

Reporting Concerns Flow Chart – BGC Education Group







Multi-Agency Contacts for Safeguarding in Education (Bristol Only Poster)

If you have concerns about a child/young person in Bristol ...

If a child is at immediate risk call the POLICE	POLICE 999	
To make an URGENT referral, i.e. a child is likely to suffer or is suffering significant harm, call children’s social care.	FIRST RESPONSE - 0117 9036444	
Out of Hours	EMERGENCY DUTY TEAM - 01454 615 165	
Mental Health Crisis (24 Hours, 7 Days a week)	Bristol Mental Health – 0300 555 0334	
To raise concerns and ask for advice about radicalisation (also contact First Response).	PREVENT DUTY - 01278 647466 PreventSW@avonandsomerset.police.uk	
To liaise with the specialist Safeguarding Police unit	Lighthouse Safeguarding Unit – Avon and Somerset police 01278 649228	
Family Help - For advice and guidance about whether to make a referral		
South 0117 9037770	East Central 0117 3576460	North 0117 3521499

If you have concerns about a professional working with a child...

To raise concerns and ask for guidance in relation to the conduct of someone who works with children	Local Authority Designated Officer - (LADO) T: 0117 9037795 kbsp-lado-notification-form.pdf
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For information, advice and guidance in relation to safeguarding policy and procedures.

[Safeguarding in Education Team](#)



T: 0117 9222710 E: Safeguardingineducationteam@bristol.gov.uk		
South Advisor Helen Macdonald helen.macdonald@bristol.gov.uk	East Central Advisor Vacant safeguardingineducationteam@bristol.gov.uk 01179222532	North Advisor Elisabeth Clark Elisabeth.Clark@Bristol.gov.uk
Child sexual exploitation	Operation Topaz (Avon and Somerset Police) https://www.avonandsomerset.police.uk/forms/vul	
Safer Connections Urgent Referrals and Threshold Advice: For all urgent referrals, requests for service (including Weapons and Drugs in Schools), and threshold advice, contact First Response: T: 0117 903 6444 Partnership Support: To request non-urgent, non-case specific support from the Partnership Team (such as consultations, training, or coordination around emerging concerns) E: saferconnections@bristol.gov.uk		
Child Missing from Education	Bristol City Council – Education Welfare https://www.bristol.gov.uk/schools-learning-early-years/children-missing-education-cme	
Children affected by Forced Marriage	Forced Marriage Unit T: (0) 20 7008 0151 E: fmu@fco.gov.uk	
Online Safety Advice	Professional Online Safeguarding Helpline T: 0344 381 4772 E: helpline@saferinternet.org.uk	
Reporting online sexual abuse and grooming	Child Exploitation and Online Protection command https://www.ceop.police.uk/ceop-reporting/	
FGM advice	NSPCC FGM Helpline T: 0800 028 3550 E: fgmhelp@nspcc.org.uk	
Domestic Abuse support (Bristol)	Directorate of local and national services https://www.bristol.gov.uk/crime-emergencies/abuse-violence	
Young Carers – advice and support.	Carers Support Centre T: 0117 958 9980 W: https://www.carerssupportcentre.org.uk/young-carers/contact-young-carers/	



Whistleblowing professional policy	NSPCC Whistleblowing hotline T: 0800 028 0285 E: help@nspcc.org.uk	
Mental health Advice (Local) Child and Adolescent Mental health (CAMHS) Primary Mental Health Specialists (advice) Child and Adolescent Mental Health		
South 0117 3408121	East Central 0117 3408600	North 0117 3546800
Avon and Wiltshire Mental Health Partnership NHS Trust 24/7 crisis line: 0800 953 1919		
Advice around harmful sexualised behaviour.	Be Safe 0117 3408700 W: https://cchp.nhs.uk/cchp/explore-cchp/be-safe	
	Brook Traffic Light Tool https://legacy.brook.org.uk/brook_tools/traffic/index.html?syn_partner=	



Other Local Authority Contacts

Local Authority in which the child is resident	Contact details	Out of hours/ Weekend
South Gloucestershire	Access and Responses Team • 01454 866000 - Monday to Thursday 9.00 – 5.00, 4.30 on Friday • E: accessandresponse@southglos.gov.uk • W: South Glos LIFE An introduction to children's social care	Emergency Duty Team 01454 615165
North Somerset	Single Point of Access • 01275 888 808 –Monday-Thursday 8.45am-5pm, Friday 8.45am-4.30pm • W: Children, young people and families North Somerset Council	
Bath and North East Somerset (BANES)	Children's Social Work Services • 01225 396312 or 01225 396313 weekdays, 8.30am to 5pm, except Fridays when we're closed from 4.30pm • E: ChildCare_Duty@bathnes.gov.uk • W: Report a concern about a child Bath and North East Somerset Council	



BGC

GROUP



Bath & North East
Somerset Council

Improving People's Lives



Key Contacts

If you need to make a child protection referral or discuss a concern about a child:

Children's Social Care

Bath Area & North East Somerset Area: **01225 396111 or 01225 477929**

Mon-Thurs 8.30am to 5pm; Fri 8.30am to 4.30pm

Or email for Triage: Childcare_duty@bathnes.gov.uk

Link to complete an online Request for Service via webform:
<https://beta.bathnes.gov.uk/report-concern-about-child>

Out of Hours Emergency Duty Team: 01454 615165

Police – Public Protection Unit Duty Desk: 01225 842786

If a child or young person is in immediate danger then please dial 999 and ask for police assistance.

If allegations are made about a member of staff or other adult in your setting you must contact the Local Authority Designated Officer (LADO)

LADO 01225 396810

LADO@bathnes.gov.uk

To report allegations to Ofsted (which must be done within 14 days of receiving the allegation/complaint)

Complaints/concerns: 0300 123 4666

Helpline: 0300 123 1231

Whistleblowing: 0300 123 3155



Appendix C - Dealing with a disclosure of abuse

When a child tells me about abuse they have suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell them you are pleased that they are speaking to you.
- Never promise confidentiality. Assure them that you will try to help but let the child know that you may have to tell other people in order to do this. State who this will be and why.
- Encourage the child to talk but do not ask "leading questions" or press for information. Use 'Tell Me, Explain to me, Describe to me' (TED) questioning.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that they have a right to be safe and protected.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what they have told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

- The 5 'R's are helpful in understanding what professionals' duties are in relation to responding to an incident.

Recognise – Respond – Reassure – Refer – Record



Appendix D - Types of abuse and neglect

Abuse and neglect is defined as the maltreatment of a child or young person whereby someone may abuse or neglect a child by inflicting harm, or by failing to prevent harm. They may be abused by an adult or adults or by another child or children.

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. For children with Special Educational Needs and Disabilities (SEND) additional barriers can exist when identifying abuse and neglect, these 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.

To address these additional challenges, schools and colleges should consider extra pastoral support for children with SEND (KCSIE).

The following are the definition of abuse and neglect as set out in Working Together to Safeguard Children (2023) however, the ultimate responsibility to assess and define the type of abuse a child or young person may be subject to is that of the Police and Children's Services – our responsibility is to understand what each category of abuse is and how this can impact on the welfare and development of our children and where we have concerns that a child or young person may be at risk of abuse and neglect (one or more categories can apply) to take appropriate action as early as possible.

Physical abuse: 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.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and 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 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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.

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.



Appendix E Specific actions to take on topical safeguarding issues

General or national guidance will not be included here. A summary of specific duties are in Keeping Children Safe in Education 2023 Annex A and Access to local guidance can be found in Appendix A of this document.

In recognition that the threshold of child protection is 'likely to suffer' significant harm, BGC Education Group may need to make a referral to children's social care. Where possible, this will involve notifying the parent/carer if it does not place the learner at further risk of harm. In all other circumstances information will be shared in line with section 2.2 Information Sharing.

It is also important to recognise the importance of liaising with other education settings who may have siblings attending. It is likely that they may hold additional information which will support early identification of harm and in turn develop your assessment of need.

Harm Outside The Home (HOTH) - including Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines, online harm, modern slavery, child on child abuse.

BGC Education Group will ensure that early help intervention is provided as soon as a concern of HOTH is identified. Consultation and advice will be sought from Local Authority and targeted services to consider the appropriate support available. The child and their families will be part of any planning and interventions.

- If there is evidence that a child is experiencing HOTH BGC Education Group will make a referral to First Response on 0117 903 6444.
- If there is intelligence or information which indicates that the child or group of children are at risk of or involved in criminality, BGC Education Group will share

information with the police via 101 or online via Avon and Somerset Police's online reporting form: <https://www.avonandsomerset.police.uk/forms/vul> This information will support proactive activity to disrupt criminal activity in relation to exploitation or harm outside the home more broadly.



· BGC Education Group will contact Safer Connections for inter-agency support, consultation, and advice about responding to HOtH and for guidance in implementing contextual safeguarding strategies to improve safety for vulnerable learners.
saferconnections@bristol.gov.uk

Domestic Abuse –

Operation Encompass is a national operation where local police forces notify when the police are called to an incident to domestic abuse. Avon and Somerset have their own version of this and will notify education settings whenever they have responded to a domestic abuse incident. This will enable the education setting to take proactive action and reasonable adjustments in relation to behaviour management and achieving positive educational outcomes.

Under the current information sharing protocol, the education setting **is not permitted** in sharing this information without seeking consent from Avon and Somerset police in case this can put a victim and learners at further risk of harm. The only exception to this when information is shared with new education setting (part of statutory duties in relation to transfer of the Safeguarding/ Child Protection file, Keeping Children Safe in Education). Additional instructions around this are sent out with every single notification.

- Education settings must have signed up to a Police Safeguarding Notification Briefing to receive these.
- Each setting should have at least 2 members of trained staff able to receive and act upon these notifications.
- Each setting should promote an open culture of safeguarding to enable learners and families to disclose and feel safe to talk about their experiences and what support maybe required.

Female Genital Mutilation -

Mandatory reporting duty: [Click here for government guidance](#)

This is a legal duty for all professionals undertaking teaching work to report known cases of FGM to the police via 101. This is when they:

1. are informed by a girl under 18 that an act of FGM has been carried out on her; or



2. observe physical signs which appear to show that an act of FGM has been carried out on

These cases must be referred to the DSL who will support them to carry out their duty. It is also advised any referrals made to the police under the mandatory reporting duty is followed up with children's social care so an assessment of need and support is concurrently considered.

Travel:

National guidance has highlighted going on holiday to a risk affected country is cause for concern, local guidance has been developed to prevent discriminatory action against families from risk affected communities.

- Families are encouraged to notify the education setting when they are looking to travel during term time dates.
- This will prompt a conversation with the DSL/ specialist trained member of staff to discuss and explain what FGM is in that; it is significantly harmful and illegal to practice this.
- The setting will complete an FGM Referral Risk assessment (available on the Keeping Bristol Safe Partnership website) with the family to identify any support that the family may require in relation to FGM.
- Proportionate action is taken. Referrals to social care should NOT be automatically made – however should be made if there are high risk concerns identified from the FGM Referral Risk Assessment.
- These assessments should be saved onto the child's Safeguarding/Child Protection file to avoid duplication with new incidents of travel.

Online Safety – Annex B of Keeping Children Safe in Education highlights additional actions schools should take to keep learners safe online.

- For concerns around individual cases where a child has been harmed through online mediums, advice and guidance can be made through the **Professional Online Safeguarding Helpline**, T: 0344 381 4772, E: helpline@saferinternet.org.uk
- Where there have been established cases of online abuse or grooming, the school settings should alert - **Child Exploitation and Online Protection command (CEOPS)** <https://www.ceop.police.uk/ceop-reporting/>



Mental health – linked to section within main body of this policy

Child on child Abuse - linked to section within main body of this policy.

Serious Youth Violence -

To be read in conjunction with the above section around Child Criminal Exploitation. There has been local guidance issued on the issue of [weapon-in-school-guidance-2025.pdf](#)

It is important to note that should a weapon be used or there is threat of use, the police should be called immediately.

- The same day a weapon is found Safer Options should be called for a multi-disciplinary assessment of risk. A Safer Connections Advisor will determine whether the young person meets the criteria for the 'Weapons in Schools Pathway' and coordinate the response with the Police and Youth Justice Service. If the criteria for a Weapons in School intervention is not met (in situations where there is evidence of threat or direct harm), a Safer Connections Advisor will support the school to take the appropriate measures for reporting and mitigating ongoing risk.
- Whilst it is acknowledged that the decision to exclude remains with the Head Teacher/Principal it is recommended that consultation with the Safer Options Team is made so as not to further put the child at further risk of harm if they are excluded.
- Alternatives to exclusions should be considered first in recognition that by doing so a learner it may be at further risk of harm out in the community.
- Police will be notified through the multi-agency discussion held at the 'Out of Court Disposals Panel' to prevent students unnecessarily getting a criminal record.

Preventing Radicalisation - The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".¹¹⁰ This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise



themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare).

The guidance is set out in terms of four general themes:

- risk assessment,
- working in partnership,
- staff training, and
- IT policies.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child:

- under the age of 16 years (under 18, if disabled)
- by someone other than a parent or close relative (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
- with the intention that it should last for 28 days or more.

Cases of private fostering arrangements must be reported to children's social care to ensure that needs are adequately made.

Statutory guidance states that this should be done at least 6 weeks before the arrangement is due to start or as soon as you are made aware of the arrangements. Not to do so is a criminal offence.

Further support and reasonable adjustments should be made by the education setting to promote achievement of positive educational outcomes.

Young Carers

A young carer is a person under 18 who regularly provides emotional and/or practical support and assistance for a family member who is disabled, physically or mentally unwell or who misuses substances.



The setting will support learners who are young carers to appropriate support. To find out what is available locally visit the Bristol City Council Website -

<https://www.bristol.gov.uk/social-care-health/support-for-young-carers>

The Carers Support Centre can undertake an assessment of need and provide bespoke support. <https://www.carerssupportcentre.org.uk/young-carers/making-a-referral/>

Children from Forced Migration

Children with a forced migration background may be more vulnerable to criminal or sexual exploitation or may have been trafficked. It is important that staff understand what signs to look out for, and understand the National Referral Mechanism procedures.

There are other specific safeguarding issues relating to this group for example adultification, age assessments, No Recourse to Public Funds, and coming from countries where practices such as underage or forced marriage or FGM may be more prevalent.

The setting will support staff to develop and embed a proactive whole school anti-racist approach and adopt a trauma informed approach when supporting these children and their families.

There are a range of specialist support services available in the city that can be accessed for further information visit the Resources for Refugees and Asylum Seekers in Bristol - Bristol City of Sanctuary web pages

