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BCT Safeguarding and Child Protection Policy 26/27 (Part 1)

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SAFEGUARDING CONTACTS AT BIG CREATIVE TRAINING

The Designated Safeguarding Lead (DSL) is the first point of contact for all safeguarding concerns and child protection incidents:

Alexandra Marquez Head of Student Services, Safeguarding & Careers Designated Safeguarding Lead Senior Mental Health Lead	07429 776 721 020 3873 5800 ext 5812 <u>alexandra.marquez@bigcreative.education</u>
Nia Sinclair Deputy Safeguarding Manager Designated Safeguarding Lead Looked After Children (LAC) Lead	07378 146 982 020 3873 5800 ext 5808 <u>Nia.sinclair@bigcreative.education</u>
Aiysha Simmonds Student Services & Safeguarding Officer Young Carers Lead	020 3873 5800 ext 5808 <u>aiyesha.simmonds@bigcreative.education</u>
Frankie Jessener Student Services & Safeguarding Officer Young Carers Lead	020 3873 5800 ext 5808 <u>frankie.jessener@bigcreative.education</u>
Ben Jolly Director of Operations LADO Officer // GDPR Officer	07834 182 380 <u>ben.jolly@bigcreative.education</u>



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1. PURPOSE AND INTRODUCTION

This policy sets out Big Creative Training (BCT)'s arrangements for safeguarding and promoting the welfare of children and young people under 18 who receive education or training at BCT. It is to be read with Keeping Children Safe in Education 2026 (KCSIE 2026), which comes into force on 1 September 2026, and the current statutory guidance Working Together to Safeguard Children.

BCT recognises that safeguarding and promoting the welfare of children is everyone's responsibility. **All staff, volunteers, contractors, supply staff and trainee teachers must maintain an attitude of 'it could happen here', act in the best interests of the child, and report concerns immediately.**

BCT is an agent of referral and support, not an investigating agency. Where a concern may indicate abuse, neglect or exploitation, BCT will make timely referrals to the appropriate local authority children's social care, police or other agency in accordance with local procedures.

The policy is built around prevention, protection and support: creating a safe culture; following clear reporting and referral procedures; ensuring staff are trained and supported; and providing appropriate support to learners, apprentices and staff affected by safeguarding concerns.

This policy applies to all learners and apprentices under 18, staff, supply staff, trainee teachers, volunteers, contractors and visitors, and to safeguarding risks arising on-site, off-site, online and in work-placement or other third-party settings.

2. WHOLE COLLEGE APPROACH TO SAFEGUARDING

BCT will maintain a whole-college approach in which safeguarding and child protection are at the forefront of leadership, culture, curriculum, behaviour, attendance, recruitment, online safety and partnership working. All systems and decisions will be centred on the best interests of the child.

The views, wishes and feelings of children will be taken into account when determining action and support, subject to safeguarding and legal requirements.

BCT will maintain accessible, well-publicised routes for children to report abuse, neglect, exploitation, harassment or other safeguarding concerns. Concerns will be taken seriously and children will not be made to feel that reporting creates a problem.

Safeguarding arrangements will be explained at induction and reinforced through regular training and updates. All staff will receive safeguarding and child protection training, including online safety and the roles and responsibilities associated with filtering and monitoring, at induction and regular updates at least annually.

BCT will ensure that staff who do not work directly with children also understand the safeguarding systems relevant to their role.

3. POLICY

BCT recognises that trusted relationships, confidence, supportive peers and clear communication with trusted adults can help prevent abuse and promote welfare. BCT will therefore:



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establish and maintain a safe, respectful and inclusive environment where learners and apprentices feel able to speak and are listened to;

- ensure learners and apprentices know who they can approach if they are worried or in difficulty, including the DSL and deputies;
- provide opportunities to teach children how to stay safe, including relationships, sexual violence and harassment, online safety, consent, respectful behaviour and risks associated with making or sharing nudes and semi-nudes;
- address bullying, cyberbullying, prejudice-based and discriminatory behaviour, misogyny, misandry, racism and other harmful behaviours through appropriate policies and interventions;
- work effectively with parents/carers and partner agencies while sharing information when necessary to safeguard children; and
- provide appropriate support for victims and for children who display harmful or abusive behaviour, recognising that child-on-child abuse is a safeguarding issue for both.

4. FRAMEWORK

Safeguarding is the responsibility of all adults working with or on behalf of children. BCT's arrangements will comply with applicable legislation, statutory guidance and locally agreed multi-agency safeguarding arrangements.

The policy should be read alongside:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children
- What to do if you're worried a child is being abused, advice for practitioners
- local safeguarding-partner arrangements and threshold/assessment documents
- London child protection procedures; and current government guidance on specific safeguarding issues.

BCT will use the current Waltham Forest safeguarding-partner arrangements and local procedures in force at the time.

For data protection purposes, BCT will comply with the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 ('data protection laws').

5. ROLES AND RESPONSIBILITIES

All adults working with or on behalf of children have a responsibility to protect them. BCT's DSL and deputies have specific safeguarding responsibilities and the current names and contact details are set out at the front of this policy.

The DSL is responsible for managing safeguarding referrals, advising staff, maintaining the safeguarding picture, liaising with children's social care and other agencies, and ensuring the effectiveness of BCT's safeguarding arrangements. The DSL's role includes online safety and understanding the operation and effectiveness of filtering and monitoring systems.

Deputy DSLs will be trained to the required standard and will act in the DSL's absence. BCT will maintain robust cover arrangements, including a clear route for confidential reporting when the DSL/deputies are unavailable.



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Staff must not delay action because the DSL is unavailable; they should contact a senior leader and/or local authority children's social care as appropriate and inform the DSL/deputy as soon as practicable.

The Senior Management Team will provide strategic oversight, challenge and resources for safeguarding, ensure governors/trustees or equivalent receive appropriate safeguarding training, and ensure policies and procedures are effective and lawful.

The DSL will liaise with the Deputy Director of Study Programme, the Head of SEND, the Curriculum team, and other relevant colleagues where this supports safeguarding.

6. SENIOR MANAGEMENT TEAM'S ROLE IN SAFER RECRUITMENT

BCT will operate safer recruitment arrangements in line with KCSIE 2026. Recruitment and vetting decisions will be based on the requirements of the role and the relevant legal definition of regulated activity.

Before appointment, BCT will undertake the required checks, including identity, appropriate DBS and barred-list checks where required, right to work, qualifications, references, overseas checks where appropriate, and any other checks required by KCSIE 2026 or legislation. Offers will remain conditional until mandatory checks are satisfactorily completed.

BCT may conduct online searches as part of due diligence on shortlisted candidates. Any safeguarding concern identified will be considered fairly and recorded in accordance with recruitment and data protection procedures.

BCT will not rely on the former supervision exemption when determining whether activity is regulated activity. Volunteers and other adults whose duties fall within regulated activity will be subject to the appropriate checks. Existing volunteers will be reviewed where the KCSIE 2026 regulated-activity changes affect their status.

Where an individual is permitted to start before a DBS certificate is received, BCT will comply with KCSIE 2026 requirements, including appropriate supervision and all other required checks. A separate children's barred-list check will be obtained where legally permitted and required.

BCT will ensure that safer recruitment records are maintained and that staff responsible for recruitment understand current DBS, regulated-activity and disqualification requirements.

7. IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM

Tutors and other adults in school are well placed to observe any physical, emotional or behavioural signs, which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and carers and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.

As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday.

Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioral development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.



Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Abuse and Neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

8. RECOGNISING ABUSE

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect:

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **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.
- **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 from 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 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. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

9. CONTEXTUAL SAFEGUARDING

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

10. CHILD CRIMINAL EXPLOITATION: COUNTY LINES/ SERIOUS YOUTH VIOLENCE

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and



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- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

“County lines” is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.”

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their 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 that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.
- Who is vulnerable to county lines exploitation/ serious youth violence?
- The national picture on county lines continues to develop but there are recorded cases of:
- Children as young as 12 years old are being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users being targeted so that gangs can take over their homes (known as ‘cuckooing’).
- BCT understands that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person’s vulnerability include:
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;
- Economic vulnerability; • Homelessness or insecure accommodation status; • Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).



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The indicators and response arrangements in this section will be kept aligned with current Home Office, DfE and local safeguarding guidance.

The DSL of BCT works closely with Waltham Forest Safer Schools Officer to help identify and support learners and apprentices who are at risk of serious youth violence.

BCT recognises that learners and apprentices may carry weapons for a variety of reasons and we are dedicated to supporting and educating our learners and apprentices on the potential risks involved when carrying a bladed weapon. If a learner is to bring a bladed weapon onto the premises we will work closely with them, their parents and carers and police to ensure that the incident has been reported to the relevant local agencies and to ensure that appropriate intervention and support is put in place.

BCT security team carry out random searches of learners and apprentices to ensure that they are not carrying any offensive or dangerous weapons, any weapons found will be reported to and seized by the Metropolitan Police with a likely referral to the local authority Children's Services/ Bronze panel.

If a staff member becomes aware that a learner is using more than one phone (usually an indicator of potential involvement in county lines), this should be reported to the DSL immediately so the DSL can notify the parent/carer of the learner to help safeguard the learner from exploitation or potential involvement in county lines.

11. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE TO ABUSE

Any child may require additional support. Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- learners and apprentices who are looked-after by the local authority or care-leavers
- learners and apprentices who have a social worker or supported by Early Help
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage



- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

12. CHILD SEXUAL EXPLOITATION

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse including via the internet.

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. 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.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.
- Children who have been exploited will need additional support to help maintain them in education.

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

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

BCT includes the risks of sexual coercion and exploitation in the SDP curriculum, which is taught across our study program and aims to educate learners and apprentices on the risks and warning signs of CSE. A common feature of sexual exploitation is that the child often doesn't recognize the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation through safeguarding induction and training opportunities and all concerns are reported immediately to the DSL via CPOMS. The DSL will work with learners and apprentices and their parent/carer to provide timely and appropriate support for victims of CSE. Referrals to local authority CSC and/or police will also be considered, if appropriate.



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13. CHILDREN POTENTIALLY AT GREATER RISK OF HARM / CHILDREN WITH A SOCIAL WORKER

BCT will recognise that children with a social worker may have experienced adversity and may face barriers to education and safeguarding support. Staff should share concerns with the DSL and consider whether the child needs Family Help, statutory support or another coordinated response.

Where a child is known to children's social care, BCT will cooperate with the allocated social worker and other agencies, attend relevant meetings where required, share appropriate information and contribute to plans.

14. SAFEGUARDING LEARNERS AND APPRENTICES WITH SPECIAL EDUCATIONAL NEEDS

BCT recognises that children with SEND or certain medical conditions may face additional safeguarding barriers. Staff should not assume that behaviour, mood, communication difficulties or injuries are attributable to SEND or a medical condition without considering possible abuse, neglect or exploitation.

Children with SEND may be more vulnerable to isolation, bullying, coercion and exploitation, including online. BCT will make reasonable adjustments to reporting, communication and support arrangements so that children can participate safely and express concerns.

The DSL will liaise closely with the SENCO/named SEND lead and relevant professionals when a safeguarding concern involves a child with SEND.

15. HONOUR-BASED ABUSE

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. **Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach.**



16. FEMALE GENITAL MUTILATION (FGM)

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

FGM refers to procedures of any alteration involving partial or total removal of the external female genital organs. The procedure may lead to short term and long-lasting harmful consequences such as death, trauma, infections, flashbacks, infertility, kidney problems, sexual dysfunctions, incontinence, post-traumatic stress disorder etc. It is known to be practised in the North African countries, the Middle-East, Indonesia, Malaysia, India and Pakistan. However, with migration worldwide it is also practised in the UK, the USA, Canada, Australia etc.

One of the prominent reasons for the practice is to suppress women's sexual desire. There is a social pressure on women to undergo the procedure otherwise they may be segregated by their peers, or labelled "unclean". Furthermore, FGM is often a requirement for getting married in practicing communities. FGM is not a religious practice.

There are a range of potential indicators that a girl may be at risk of FGM:

- FGM often takes place in the summer holidays, as the recovery period after FGM can be 6 to 9 weeks. Professionals should be mindful of at-risk times when children go on long holidays and/or are getting a visit by a female elder from their country of origin. Additionally, girls are considered at risk where their mother or sisters have undergone FGM, and girls are talking about a 'special' event or procedure to 'become a woman.'
- The post FGM symptoms include, but are not limited to, difficulty in walking, sitting or standing, spending longer than normal in the bathroom or toilet, unusual behavior after a lengthy absence, reluctance to undergo normal medical examinations, and asking for help but not be explicit about the problem due to embarrassment or fear. They can sometimes ask about their friend's problem rather than their problem. Professionals should raise an alert to child social care via the MASH if they have any FGM concerns.

Further information on warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44), which focuses on the role of schools and colleges.

The United Nations addresses FGM as violation of human rights. In the UK FGM is a criminal offence and a harmful form of child abuse. It is illegal to practice in the UK and/or anyone involved in taking girl outside of the UK to have FGM carried out will be punished under the FGM act 2003 and Serious Crime Act 2015. LBWF follows a comprehensive approach comprising prevention, punishment, enforcement, support and protection measures to safeguard young girls from FGM.

If staff have a concern they should activate local safeguarding procedures via the MASH, using existing national and local protocols for multi-agency liaison with police and children's social care. When mandatory reporting commences in October 2015 (see below) these procedures will remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have



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been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils – it is likely that discovery will be made by disclosure by the student, parent or otherwise. These cases must be referred to police (via the local CAIT team or by calling 101). Immediate reporting is required if FGM has been performed recently, and in historical cases, reporting must take place within one month. **Reporting FGM cases is mandatory.**

17. BCIS / ALTERNATIVE PROVISION

Where BCT/BCIS provides or commissions Alternative Provision, safeguarding responsibility and lines of accountability will be clear between BCT/BCIS, the commissioning school/college and the provider.

Before placement, BCT will undertake appropriate due diligence and risk assessment. Information necessary to safeguard the child, including relevant safeguarding, attendance, behaviour and health information, will be shared lawfully with the receiving/commissioning provider.

BCT will monitor attendance, welfare and safeguarding concerns for children attending Alternative Provision and will maintain clear arrangements for reporting and responding to concerns.

18. ELECTIVE HOME EDUCATION

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the local authorities, BCT, and other key professionals will work together to coordinate a meeting with parents/carers where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of the child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

19. CHILD ON CHILD ABUSE

Children can abuse other children inside or outside BCT and online. BCT will maintain a whole-college approach to preventing and responding to child-on-child abuse and will not assume that the absence of reports means that abuse is not occurring.

All staff must challenge inappropriate behaviour and report concerns to the DSL. Sexual harassment must never be dismissed as 'banter', 'just a laugh', 'part of growing up' or 'boys being boys'. Such responses can normalise abuse and discourage reporting.

Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. BCT will consider the needs, wishes and safety of all children involved and provide timely, evidence-based support to reduce the risk of further harm.

Child-on-child abuse may include bullying and cyberbullying; prejudice-based or discriminatory bullying; abuse in intimate relationships; physical assault; threats involving weapons; sexual violence; sexual harassment;



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forcing sexual activity without consent; making or sharing nudes and semi-nudes; upskirting; and initiation/hazing violence.

20. CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT

BCT will maintain a zero-tolerance approach to sexual violence and sexual harassment. Staff will act on all reports and concerns, whether the conduct occurs on or off BCT premises or online.

BCT will consider the wishes and feelings of the child, the nature and severity of the behaviour, age and developmental factors, power imbalances, any wider pattern of behaviour and the risks to all children involved. Support will be provided to victims and appropriate interventions/support will be considered for alleged perpetrators.

Reports will be managed in accordance with KCSIE 2026 Part Five and local procedures. The DSL will decide whether to involve children's social care and/or the police and will ensure appropriate records, risk assessments and ongoing support are maintained.

21. HARMFUL SEXUAL BEHAVIOUR

BCT recognises that harmful sexual behaviour (HSB) exists on a continuum and may be displayed by children of any age. Staff should distinguish age-appropriate sexual development from behaviour that is harmful, abusive, coercive or developmentally inappropriate.

When HSB is reported, BCT will consider the safety and wellbeing of all children, developmental stage, consent, power imbalance, context, frequency, impact, online elements and any history or pattern of behaviour. Appropriate specialist advice/referral will be sought where required.

BCT will provide appropriate support to children who have experienced HSB and to children who display HSB, recognising that early, evidence-based intervention can reduce further harm.

22. CHILDREN MISSING FROM EDUCATION

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Effective information sharing between parents and carers, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or



exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

There are many circumstances where a child may become missing from education so it is vital that local authorities make judgements on a case by case basis. Although not exhaustive, the list below presents some of the circumstances that local authorities should consider when establishing their CME policies and procedures. Children may be missing from education:

- because they are suffering from abuse or neglect. Where this is suspected schools should follow local child protection procedures. However, if a child is in immediate danger or at risk of harm, a referral should be made immediately to children's social care (and the police if appropriate). Local authority officers responsible for CME should check that a referral has been made and, if not, they should alert children's social care. The Department's statutory guidance Keeping children safe in education provides further advice for schools and colleges on safeguarding children.
- Children of Gypsy, Roma and Traveller (GRT) families – Research has shown that many children from these families can become disengaged from education, particularly during the secondary school phase
- Children of Service Personnel – Families of members of the Armed Forces are likely to move frequently – both in the UK and overseas and often at short notice.
- Missing children and runaways – Children who go missing or run away from home or care may be in serious danger and are vulnerable to crime, sexual exploitation or abduction as well as missing education.
- Children and young people supervised by the Youth Justice System – Children who have offended or are at risk of doing so are also at risk of disengaging from education. Local authority Youth Offending Teams (YOTs) are responsible for supervising those young people (aged 8 to 18).
- Children who cease to attend a school – there are many reasons why a child stops attending a school. It could be because the parent chooses to home educate their child. However, where the reason for a child who has stopped attending a school is not known, the local authority should investigate the case and satisfy itself that the child is receiving a suitable education.
- Children of new migrant families – children of new migrant families may not have yet settled into a fixed address or may have arrived into a local authority area without the authority becoming aware, therefore increasing the risk of the child missing education.

23. CHILDREN WHO ARE ABSENT FROM EDUCATION

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.



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If a learner has not attended their first lesson, BCT Student Services team will attempt to contact the learner on their personal mobile number. If contact with a learner is not possible, BCT Student Services team will contact either one of the two emergency contacts in order to find out the whereabouts of the learner. If the learner missing education is in care, staff members will liaise with foster carer/key worker/social worker to understand why the learner is absent and how BCT can support their return to education.

24. EMERGENCY CONTACTS

The Keeping Children Safe in Education 2026 government policy states that where reasonably possible, all schools and colleges must obtain more than one emergency contact for each learner. BCT requests at least two emergency contacts for all learners and apprentices including; name, relation to learner, mobile number, email address and address. This is to ensure that we are able to contact one of two key adults to the learner in the case of an emergency, child missing from education or in regards to welfare/safeguarding concerns.

25. PRIVATE FOSTERING ARRANGEMENTS

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. 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 raise this with the DSL and the school should notify the local authority of the circumstances to allow the local authority to check if the arrangement is suitable and safe for the child. Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.

26. DOMESTIC ABUSE

Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.



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Domestic Abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.

Witnessing domestic abuse is really distressing and scary for a child, and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. Children can experience domestic abuse or violence in lots of different ways. They might:

- see the abuse
- hear it from another room
- see a parent's injuries or distress afterwards
- be hurt by being nearby or trying to stop the abuse.

Domestic abuse can happen in any relationship, and it affects young people too. They may not realise that what's happening is abuse. Even if they do, they might not tell anyone about it because they're scared of what will happen, or ashamed about what people will think.

BCT has a partnership with **Operation Encompass**, which operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

27. PREVENT AND ANTI-RADICALISATION

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”. This duty is known as the Prevent duty.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of BCT's safeguarding approach.

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

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the



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internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable 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 vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college 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.

At BCT we are fully aware and committed to the on-going protection and safety of our pupils, staff and wider community in accordance with DfE guidance 'Working together to Safeguard Children' (2023) and 'Keeping Children Safe in Education' (2024). An integral part of that work relates to the government's Prevent strategy and the duties it places on academic institutions.

BCT is committed to providing a secure environment for pupils, where children feel safe and are kept safe. All adults in our school recognize that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. Staff will be alert to issues including:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race or culture

By continually developing our leadership and accountability practices, staff training opportunities (primarily the Home Office developed WRAP Training), referral systems and management of those referrals, we strive to demonstrate a proactive and diligent approach to this aspect of our responsibilities as educators and safeguarding professionals.

Aligned with a consistent delivery of a broad and balanced curriculum and use of the Local Authority-approved Self-Assessment framework, we strive to protect our learners and apprentices - and the wider community - against the threats of extremism, through the promotion of both fundamental values and cohesion amongst our communities.

28. ONLINE SAFETY - INTERNET FILTERING AND MONITORING

Online safety is a safeguarding responsibility, not solely an IT function. BCT will assess and manage risks relating to content, contact, conduct and commerce, including pornography, self-harm and suicide content, extremism/radicalisation, hate and prejudice, misogyny/misandry, racism, grooming, scams, abuse, cyberbullying and harmful or illegal activity.



BCT will maintain appropriate filtering and monitoring systems. The effectiveness of filtering and monitoring will be reviewed at least annually by the senior leader responsible, with support from the DSL and IT/technical staff. The review will include checks that systems operate across relevant internet-connected devices and locations, and the outcome and actions will be recorded.

All staff will understand their roles and responsibilities in relation to filtering and monitoring, including how to report concerns and how alerts are escalated. Filtering and monitoring will not replace staff professional judgement or direct safeguarding action.

BCT will maintain a separate Online Safety/Acceptable Use framework and a mobile phone policy. Safeguarding concerns arising from personal devices, messaging platforms, social media, livestreaming or other technologies will be managed under this policy and the relevant procedures.

BCT will consider safeguarding, privacy, data protection and ethical risks associated with generative artificial intelligence. This includes AI-generated or digitally altered sexual images, deepfakes/deep nudes, impersonation, grooming, misinformation/disinformation and misuse of personal information.

Where children make or share nudes or semi-nudes, including AI-generated or altered images, the matter will be treated as a safeguarding concern and managed in line with current KCSIE/UKCIS guidance. Staff must not unnecessarily view, copy, download or distribute sexual images.

29. MENTAL HEALTH

Mental health problems can develop into safeguarding concerns, including self-harm, suicidal ideation or suicide risk, and may also indicate that a child has experienced or is at risk of abuse, neglect or exploitation.

Staff are not expected to diagnose mental health conditions. They should be alert to significant changes in behaviour, withdrawal, sleep difficulties, loss of interest, self-harm, eating difficulties, neglect of self-care or other concerning indicators and report safeguarding concerns to the DSL.

Where a mental health concern is also a safeguarding concern, staff must follow this policy. BCT will provide or signpost appropriate support and will seek specialist advice/referral where needed. If a child is in immediate danger, emergency services will be contacted.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Referrals to BCT's internal counselling service may be appropriate for general mental health support; if a learner requires a more tailored approach/assessment, referrals to the young person's mental health team in borough will be considered (CAMHS, IAPT, GP referrals).

There are a number of staff members at BCT who have been fully trained to deliver Mental Health First Aid (MHFA). Mental Health First Aid is a training program that teaches members of the public how to help a person developing a mental health problem (including a substance use problem), experiencing a worsening of an existing mental health problem or in a mental health crisis. Like traditional first aid, Mental Health First Aid does not teach people to treat or diagnose mental health or substance use conditions. Instead, the training teaches people how to offer initial support until appropriate professional help is received or until the crisis resolves.



30. SAFEGUARDING AND CHILD PROTECTION PROCEDURES

Any staff member, volunteer, visitor, contractor, supply staff member or trainee teacher who receives a disclosure, sees indicators of abuse, neglect or exploitation, or otherwise has a safeguarding concern must report it immediately to the DSL or deputy and record the concern through BCT's safeguarding recording system (CPOMS) as soon as practicable and by the end of the working day where possible.

Staff must listen, take concerns seriously, reassure the child, avoid leading questions, not promise confidentiality and share information only on a need-to-know basis. Staff must not investigate the concern themselves.

The DSL/deputy will determine the appropriate response, which may include internal support, a Family Help assessment, referral to children's social care, referral to the police or another agency. Where a child is suffering or likely to suffer significant harm, a referral will be made immediately in accordance with local procedures.

Parents/carers will normally be informed where appropriate, unless doing so would increase risk to the child or prejudice a criminal investigation or other safeguarding process. The rationale for decisions, including decisions not to share or refer, will be recorded.

If the DSL/deputy is unavailable, staff must not delay action. They should contact a senior leader and/or local authority children's social care or police as appropriate, and inform the DSL/deputy as soon as practicable.

31. TRAINING AND SUPPORT

All staff will undertake safeguarding and child protection training at induction and receive regular updates, at least annually. Training will cover online safety, filtering and monitoring, child-on-child abuse, reporting routes, professional curiosity, information sharing, and relevant local safeguarding procedures.

The DSL will undertake training to the required standard and maintain knowledge and skills through regular updates and safeguarding forums/briefings. Deputy DSLs will receive appropriate training to provide effective cover.

Temporary staff, supply staff, volunteers, contractors and trainee teachers will receive safeguarding induction appropriate to their role before or at the start of their work with children.

Staff will be supported to raise safeguarding concerns and will have access to the DSL and appropriate wellbeing/support arrangements.

32. PROFESSIONAL CONFIDENTIALITY

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of safeguarding.

The only purpose of confidentiality in this respect is to benefit the learner. A member of staff must never guarantee confidentiality to a learner nor should they agree with a learner to keep a secret, as where there is a safeguarding concern this must be reported to the DSL and may require further investigation by appropriate authorities.



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Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a “need to know basis”. Any information shared with a member of staff in this way must be held confidentially by them.

Where sharing will be in the best interests of the relevant learner information will be shared with other organisations.

33. RECORDS AND MONITORING

Accurate records are essential. All safeguarding concerns, discussions, decisions, actions, referrals and outcomes will be recorded securely and confidentially in accordance with data protection laws.

Big Creative Training uses CPOMS (<https://bigcreative.cpoms.net/>) to keep secure safeguarding information and information. Well-kept records are essential to good safeguarding practice.

BCT is clear about the following:

- The need to accurately record any concern held about a learner within the company
- The status of such records
- Should these records be passed over to other agencies.

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Information will be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- note of any action taken, decisions reached and the outcome.
- Category of concern ticked appropriately – only select the main cause of concern

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy)

Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse must record on CPOMS immediately.

If a learner transfers from BCT, these files may be copied and forwarded to the learner’s new establishment marked confidential and for the attention of the DSL if this is deemed to be in the learner’s best interests.

34. ATTENDANCE AT SAFEGUARDING CONFERENCES AND CORE GROUPS

It is the responsibility of the DSL to ensure that BCT is represented or a report is submitted to any safeguarding conference called for learners and apprentices on programmes at BCT or previously known to them. Whoever attends should be fully briefed on any issues or concerns BCT has and be prepared to make decisions on registration at the end of the conference.

When a learner is the subject of a child protection plan, it is the DSL’s responsibility to ensure that the learner is monitored regarding their attendance, welfare and presentation.



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If BCT is part of the core group, then the DSL should ensure that BCT is represented at these meetings; that there is a record of attendance and issues discussed on CPOMS.

All concerns about the CP plan and /or the learner's welfare should be discussed and recorded at the core group meeting unless the learner is at further risk of significant harm before the meeting date. In this case the DSL must inform the learner's social worker immediately and then record that they have done so and the actions agreed.

35. APPRENTICES

BCT will take all necessary steps to support and protect its apprentices, both while at work and during their off the job training. Apprentices will receive training and support regarding Safeguarding and Prevent as detailed in this policy. Prevent and wider issues arising are discussed during apprentice reviews, and this is documented throughout ILPs.

All apprentices are assigned a work coach employed by BCT who meets regularly with the apprentice to support them. The work coach is responsible for ensuring the apprentice is aware of the safeguarding and Prevent arrangements in place, and what to do if they have any concerns.

Apprentices are issued an induction pack at the start of their programme, this outlines details for student services and safeguarding team. The work coach will also reiterate this information during their initial assessment meetings.

BCT will assess if the apprentice has additional needs through their enrolment and induction process. If this is the case, we will refer to the SENDco.

If an apprentice raises concerns about the workplace or a colleague, we would stop them attending the workplace until an investigation has been carried out by the relevant staff and DSL.

Concerns about an apprentice are referred to, and managed by, the DSL in exactly the same way as any other learner at BCT

Apprentices who are required to work from home (WFH) will be made aware of the policy regarding WFH and supported in the same way as if they were at work in person. Employers must complete the WFH risk assessment template supplied to them by BCT.

Apprentices and employers must follow the detailed guidance around safeguarding and Prevent available in the relevant policies and procedures issued to them as part of the enrolment and induction processes. This will be monitored, checked and recorded by BCT

36. WORK PLACEMENTS

All work placements for learners and apprentices will be risk assessed according to our current policies.

H&S remains the responsibility of the placement provider however we will conduct and record appropriate due diligence checks.

All placements will provide a H&S induction to the learners or apprentices using the BCT template.



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Where under 18s are lone working with the placement provider BCT will conduct an enhanced DBS check on that individual.

BCT will provide guidance to placement providers as to appropriate action they should take if a learner discloses any concerns to them.

BCT will provide guidance to learners and apprentices who are on work placement as to action they should take if they have any concerns about their placement.

37. RISK ASSESSMENT OF TRIPS AND VISITS

In order to safeguard learners and apprentices, all activities that take place outside of BCT designated training centres must be prepared for and risk assessed in accordance with the policies and procedures in the staff handbook.

Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure.

38. USE OF COLLEGE PREMISES FOR NON-COLLEGE ACTIVITIES

Where BCT proprietors hire or rent out college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When the proprietor, under the direct supervision or management of their college staff, provides services or activities their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.

The proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

39. SUPPORTING LEARNERS AND APPRENTICES AT RISK

BCT recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place. BCT may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, whilst at BCT their behaviour may still be challenging and defiant or they may not actively participate.

BCT will endeavour to support pupils through:

- The curriculum to encourage good self-esteem and self-motivation.



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- The organisational ethos which promotes a positive, supportive and secure environment and which gives all learners and apprentices and adults a sense of being respected and valued.
- The implementation of BCT's behaviour management policies.
- A consistent approach agreed by all staff which will endeavour to ensure the learner knows that some behaviour is unacceptable but they are valued.
- Regular liaison with other professionals and agencies that support learners and apprentices and their families.
- A commitment to develop productive, supportive relationships with parents and carers, whenever it is in the learner's best interest to do so.
- The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations.
- Recognition that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse, so staff who work in any capacity with learners and apprentices with profound and multiple disabilities, sensory impairment and / or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.
- Recognition that in a home environment where there is domestic violence, drug or alcohol abuse, learners and apprentices may also be vulnerable and in need of support or protection.

40. TEACHING CHILDREN HOW TO STAY SAFE

BCT will provide opportunities for learners to learn how to recognise risk and stay safe. This includes respectful relationships, consent, sexual violence and harassment, bullying and discriminatory behaviour, online safety, making or sharing nudes and semi-nudes, harmful content, grooming, exploitation, radicalisation and how to seek help.

Online safety education will reflect the fact that children may experience risks both online and offline and will include responsible use of social media, mobile phones and generative AI.

41. USE OF REASONABLE FORCE

BCT will use physical intervention only when lawful, necessary, proportionate and reasonable in the circumstances, and will comply with current government guidance on the use of reasonable force and restrictive interventions.

Any use of force will be recorded, reported and reviewed. Particular consideration will be given to children with SEND, mental health needs and medical conditions, and to equality and human-rights duties.

42. ALLEGATIONS/CONCERNS AGAINST STAFF (INCLUDING SUPPLY STAFF AND VOLUNTEERS)

BCT will maintain procedures for managing safeguarding concerns or allegations about any adult working in or on behalf of BCT, including staff, supply staff, trainee teachers, volunteers and contractors. Concerns must be



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reported regardless of how small they appear. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings do happen.



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Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. In the event of suspension, the school will provide support and a named contact for the member of staff.

Staff, parents and carers are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the LADO/police.

BCT acknowledges that there are two levels of allegation/concern:

- Allegations that may meet the harm threshold.
- Allegations/concerns that do not meet the harm threshold – otherwise referred to as ‘low-level concerns’.

BCT will work in line with the guidance around allegations against staff/supply staff/volunteers as stated in Keeping Children Safe in Education 2026. BCT Senior Management team will review cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. Guidance will be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.)

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt, BCT will seek advice from the Waltham Forest local authority designated officer (LADO).

43. ALLEGATIONS AGAINST FOSTER CARER IF A CHILD IS LOOKED AFTER

If a student who is looked after by their local authority discloses a safeguarding or child protection concern relating to their carer this will immediately be reported to:

- The local authority LADO
- The supervising Social Worker
- The student's Social Worker
- Local Authority MASH team

44. WHISTLE BLOWING



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We recognize that children cannot be expected to raise concerns in an environment where staff members do not do so. Therefore, all staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in accordance with the BCT whistle blowing policy.

45. COMPLAINTS

Complaints by young people can be made under the complaints procedure published on BCT Public Policies. Complaints by staff can be made under the complaints procedure in the staff handbook.

46. POLICY REVIEW

The DSL is responsible for ensuring that this policy is reviewed at least annually and sooner where legislation, KCSIE, local safeguarding arrangements or organisational practice changes. The policy will be approved through BCT's governance arrangements and made available as required.

The policy owner will ensure that named safeguarding contacts, local referral routes and linked policies are checked and updated. Previous versions will be retained in accordance with BCT's records-retention arrangements.

47. OUT OF HOURS SAFEGUARDING CONTACT

For safeguarding issues out of hours or during BCT holiday activities, immediately contact the Deputy DSL/out-of-hours safeguarding contact shown on the current policy contact sheet. If a child or young person is at immediate risk of danger, call 999. Local authority emergency/out-of-hours safeguarding contacts must be checked and kept current.

48. KEY CONTACTS WITHIN THE LOCAL AUTHORITY (Waltham Forest)

The Safeguarding in Education Service is able to provide advice in non-emergency situations:

<https://thehub-beta.walthamforest.gov.uk/safeguarding-in-education>

The Waltham Forest local safeguarding partners can provide advice and training. The Local Safeguarding Partners within Waltham Forest consist of; Waltham Forest Council, NHS Waltham Forest, Newham and Tower Hamlets CCGs and Waltham Forest and Newham Police.

If you feel that a child is at immediate risk of harm, please call the Police on 999 who will be able to provide an immediate response. Alternatively, you can contact your local police on 101 at any time.

If you don't believe the risk requires immediate action, contact the Waltham Forest Multi Agency Safeguarding Hub team (previously the Referral and Advice Team) to discuss your concerns on:

- Tel: 020 8496 2310 (Monday to Thursday, 9am-5.15pm and Friday, 9am-5pm)
- Tel: 020 8496 3000 (Out of Hours).



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You will get to speak to a social worker who is part of the Waltham Forest Multi Agency Safeguarding Hub (MASH) team. The social worker will need to gain as much information as possible about the child and the family. If the young person does not reside in Waltham Forest contact their home borough social services.

Date Updated	To Review	Responsibility
July 2026	Jul 2027	AMQ