

Safeguarding Children Policy

This policy also applies to EYFS pupils and children in our Nursery Provision

Appointed Persons:

Designated Safeguarding Lead (DSL): Emma Brewer (Assistant Head – Pastoral, Junior School Lead, Mental Health & Wellbeing Lead)	01234 352031 ebrewer@bedfordgreenacre.co.uk
Deputy Designated Safeguarding Lead: Alex Robinson-Welsh (SEND Co)	01234 352031 / 01234 327776 ARobinson-Welsh@bedfordgreenacre.co.uk
Designated Safeguarding Lead for Nursery: Emma Niro (Head of Nursery/EYFS Lead)	01234 324526 eniro@bedfordgreenacre.co.uk
Deputy Designated Safeguarding Lead for Nursery: Tenisha Rodd (Junior Deputy for Nursery)	01234 324526 trodd@bedfordgreenacre.co.uk
Appointed Governor with responsibility for Safeguarding (including E Safety) Viv Barker	vbarker@bedfordgreenacre.co.uk

The annual review of this policy is overseen and ratified by the Chair of Governors with the full Board. The policy is updated whenever needed so that it is kept up to date with safeguarding issues as they emerge and evolve including lessons learnt to ensure the school is equipped with the knowledge to carry out our functions. All Governors are given the appropriate safeguarding training on induction and on a regular basis thereafter by the school DSL Team following the local partnership's guidelines.

Integrated Front Door (IFD) or Multi-Agency Hub

The IFD acts as the first point of contact in Bedford Borough for receiving all early help assessments and safeguarding concerns or enquiries. It brings together the Multi-Agency Safeguarding Hub (MASH) and Early Help Hub in one place to facilitate early, better quality information sharing, analysis and decision-making to safeguard children, young people and families more effectively. Other local authorities use Multi-Agency Hubs (MASH).

The Early Help Hub focuses on partnership working with agencies to provide children, young people and families with early help assessments and intervention to ensure families are able to access services and support at the right time.

Multi-Agency Working

We work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes working with Early Help Services (refer to **Early Help**) and multi-agency liaison to support children subject to child protection plans.

Bedford Borough's collaborative working arrangements for safeguarding and promoting the welfare of children is named the Bedford Borough Safeguarding Children Partnership (BBSCP). Their Multi Agency Safeguarding Arrangements (MASAs) set out how the safeguarding partners work together with other agencies to identify and respond to the needs of children in Bedford Borough. The three safeguarding partners Bedford Borough

Council, Bedfordshire Police and the Integrated care systems have equal and joint responsibility for local safeguarding arrangements.

Data protection fears will not be a barrier to information sharing as the safety of our children is of utmost importance. We will adhere to the relevant data protection principles, which allow us to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. We will not allow anything to stand in the way of the need to promote the welfare and protect the safety of our children.

Multi-agency working and information sharing is especially important to identify and prevent child sexual exploitation. Refer to Appendix 1 for other contact details.

Operation Encompass

Our school is part of Operation Encompass. This is a national police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Violence and Abuse and which is in place in every police force in England and Wales.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act. Operation Encompass means that the police will share information with our school about **all** police attended Domestic Abuse incidents which involve any of our children **PRIOR** to the start of the next school day. This ensures that we have up-to-date relevant information about the child/ren circumstances and can enable support to be given to the child/ren according to their needs.

A member of our Safeguarding Team, known as a Key Adult, is trained to allow them to liaise with the police and to use the information that has been shared, in confidence, while ensuring that the school is able to make provision for possible difficulties experienced by children, or their families, who have experienced or been exposed to a domestic abuse incident.

Our parents are fully aware that we are an Operation Encompass school and we ensure that when a new child joins our school the parents/carers are informed about Operation Encompass.

The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

As a staff we discuss how we can support our children who are experiencing Domestic Violence and Abuse on a day-to-day basis and particularly following the Operation Encompass notification. We use the Operation Encompass Handbooks to inform our thinking. We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.

When Principal, DSLs or Deputy DSL leave the school and other staff are appointed, they will ensure that all Operation Encompass log in details are shared with the new Principal /Key Adults and that the new member of staff will undertake the Operation Encompass online training.

Introduction

The aim of this policy is to:

- provide help and support to meet the needs of children as soon as problems emerge,
- to protect children from maltreatment, whether that is within or outside the home, including online,
- to safeguard and promote our pupils' welfare, safety and health by fostering an honest, open, caring and supportive environment.

We will always act in the best interests of the child. This policy is consistent with:



- The legal duty on schools to safeguard and promote the welfare of children as described in *section 157 of the Education Act 2002 for independent schools and academies*
- The statutory guidance *Keeping Children Safe in Education–Statutory Guidance for Schools and Colleges* – September 2025
- The Government document *Working Together to Safeguard Children 2023* which sets out statutory guidance for agencies including school and colleges
- *What to do if you're worried a child is being abused*, DfE March 2015
- *The Childcare Act 2006*
- *Mental Health and Behaviour in Schools*, DfE November 2018
- The statutory guidance *The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations*, 2018
- *Information Sharing. Advice for Practitioners providing safeguarding services to children, young people, parents and carers*, DfE May 2024
- Bedford Borough Safeguarding Children Partnership Inter-agency Child Protection Procedures <http://bedfordscp.proceduresonline.com/chapters/contents.html> ("safeguarding partners" procedures)
- *Prevent Duty Guidance*, 2023
- *The Prevent Duty: Departmental advice for schools and childcare providers*, June 2015
- *The use of social media for online radicalisation*, July 2015
- *Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decisionmakers working to protect children from child sexual exploitation*, DfE February 2017
- *Preventing and tackling bullying: Advice for headteachers, staff and governing bodies*, DfE July 2017
- *Sexual violence & sexual harassment between children in schools & colleges*, DfE May 2018
- *Teaching Online Safety in School*, DfE June 2019
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education* DfE 2026.
- *Review of Sexual Abuse in Schools & Colleges*, Ofsted June 2021

BBSCP Threshold Guidance

We have a duty to respond to both Children in Need and Children Suffering or Likely to Suffer Significant Harm. In order to ascertain the appropriate response, we refer to the Bedford Borough Multi-Agency Thresholds Document. This outlines how we access local services and the type of help to be provided. It also includes the level of need for when a child should be referred to the local authority children's social care for assessment and for statutory services.

Early Help

Early Help means providing support as soon as a problem emerges at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. We are alert to the potential need for early help for **all** our children, particularly any who are disabled and have specific additional needs, have special educational needs, are young carers, are showing signs of engaging in anti-social or criminal behaviour, or whose family circumstances present particular challenges for the child.

All staff are aware that we have a responsibility in school to identify these needs and work together to provide children with the help they need. In the first instance staff should discuss Early Help requirements with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead who will support staff in liaising with other agencies and setting up an inter-agency assessment.

Staff may be required to support other agencies and professionals in facilitating an inter-agency

assessment/Early Help Assessment (EHA). In these cases, we will respond according to our local Early Help Service procedures to complete an EHA. This will help us to identify what the child needs. We will liaise closely with Bedford Borough Early Help Service, including acting as lead professional to coordinate support, with the agreement of the child and their parent/carer(s), and in accordance with Bedford's Early Help Strategy.

We will review and communicate with children's social care teams outlined on page 1 of this document if a child's welfare is still a concern or not improving. If our concern is of an immediate safeguarding nature, then our Safeguarding procedures outlined in this policy will be followed.

Children who may especially benefit from Early Help

Any child may benefit from Early Help but staff should be particularly alert to the potential needs any child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is a Looked After child;
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing / goes missing from education, home or care;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in family circumstance which present challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect and/or exploitation;
- Is at risk of being radicalised or exploited;
- Is privately fostered;
- Has a parent or carer in custody, or are affected by parental offending
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit

Safeguarding Commitment

This policy applies to all staff, governors and visitors to the school. At Bedford Greenacre Independent School we recognise that Safeguarding and promoting the welfare of children is **everyone's** responsibility and forms part of the wider safeguarding system for children as described in statutory guidance '*Working Together to Safeguard Children 2023*'. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding our children. **Staff are therefore reminded that anyone can make a referral to Children's Social Care if they are worried about a child.** We ensure parents are aware of our policy by publishing it on our website, displaying information in our reception and by raising awareness at meetings with parents. Bedford Greenacre Independent School has an open and accepting child-centred approach towards our pupils as part of our responsibility for pastoral care and at all times consider what is in the **best interests** of the child. All staff encourage children and parents to feel free to talk about any concerns and to see school as a safe place when there are difficulties. Children's fears and concerns will be taken seriously and children encouraged to seek help from members of staff.

The aim of this policy is to safeguard all the children in our care. All staff understand that both mental and physical health are relevant to safeguarding and the welfare of children. All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of school environments. If staff have any concerns they must immediately seek advice from the Designated Safeguarding Lead / Deputy Designated Safeguarding Lead. If they feel that any child requires additional support from one or more agencies, advice must be sought from the SEN team, and/or the Assistant Head (Pastoral).

Our School will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that children know there are adults in the school who they can approach if they are worried or are in difficulty.
- Ensure that we have trained designated members of staff (DSL/Deputy DSL) who undertake training of staff.
- Ensure that all school governors receive appropriate induction training in safeguarding and child protection (including online), which will be regularly updated.
- Train staff (including the Principal and volunteers) to understand their responsibilities in safeguarding and to be alert and knowledgeable of the signs of abuse/neglect/exploitation.
- Establish effective working relationships with parents and professionals from other agencies to share information and work together to get a full picture of need so the right help can be given to a child. **Everyone** who comes into contact with our children and families has a role to play in identifying concerns, sharing information and taking prompt action.
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff, including peripatetic teachers, cleaners and parent and other volunteer helpers who will work with children including references and enhanced DBS checks.
- Ensure that members of staff in charge of recruitment have undertaken training in safer recruitment (in line with the Richard Recommendations)
- Ensure that all staff are trained and understand the child protection procedures and all cases of child abuse/neglect/exploitation or suspected abuse/neglect/exploitation are reported immediately to the DSL / Deputy DSL for referral to IFD/Child Care Duty Desk/Social Care. This does not preclude anybody from referring a case to the Duty Desk or police should the need arise.
- Ensure all new members of staff, including supply staff, part time, peripatetic staff, are directed to our Safeguarding procedures as part of their induction.

- Ensure that Safeguarding training is included in staff INSET training days.
- Ensure our procedures are reviewed and updated regularly.
- Ensure that parents and carers have access to our policy with regards to child protection procedures.
- Report any concern over absenteeism to the designated member of staff.
- Include in the curriculum activities and opportunities for EFL/PSHCE/RSHE, which equip children with the skills they need to stay safe from abuse/neglect/exploitation (including online) and to know to whom they can turn to for help. The following areas are among those addressed in EFL/PSHCE and in the wider curriculum:
 - Bullying/cyber-bullying
 - Diversity issues relationships
 - Drug, alcohol and substance misuse
 - E safety/Internet safety
 - Fire and water safety
 - Protective behaviours
 - Road safety stranger awareness
 - Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils)
 - Health Education

Mental Health

All staff are aware that 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, neglect and/or exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

These experiences, can impact on a child's mental health, behaviour and education.

If staff have a mental health concern about a child, that is also a safeguarding concern, immediate action is taken and the procedures outlined in this policy are taken.

For further details, refer to our Mental Health and Wellbeing Policy.

Staff Training

All staff who are in direct contact with children undertake the following online training every three years:

- Safeguarding Children refresher training
- Prevent Duty training – online
- E-Safety training – online

They also receive Safeguarding and Child Protection training regularly as part of the INSET programme. This includes how to manage a report of child-on-child sexual violence and sexual harassment. It also includes staff expectations, roles and responsibilities in relation to filtering and monitoring of pupils' internet use. In addition, staff receive updates via email, staff meetings/briefings. New members of staff undertake online Safeguarding in Education training, online Prevent Duty training and online ESafety training as part of their induction (see **Induction Process**). The DSL / Deputy DSL undertake regular and relevant training to update their skills and

knowledge as outlined in the relevant section of this policy.

To ensure that all non-teaching staff members receive regular and up-to-date Safeguarding training, the following measures are taken:

- Office staff and other support staff such as lab technicians attend the Safeguarding section of whole school staff meetings
- Music and Drama peripatetic teachers and external club providers meet with DSL/Deputy DSL at least once per year to be updated and ensure understanding of safeguarding procedures
- Other regular visitors to the school e.g. School Counsellor, Volunteers and Sports Coaches meet with DSL/Deputy DSL at least once per year to be updated and ensure understanding of safeguarding procedures
- Cleaners, Kitchen staff and Maintenance staff meet with DSL/Deputy DSL at least once per year to be updated and ensure understanding of safeguarding procedures
- Nursery Nurses at Bedford Greenacre Nursery attend Safeguarding training organised by or delivered by the Nursery DSL

Training occurs termly or when there are significant changes to report. The School Business Manager keeps a register of attendance.

Governor Training

Governors will receive appropriate safeguarding and child protection training which will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures with school are effective and support the delivery of a robust whole school approach to safeguarding.

Roles and Responsibilities

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. All adults working with or on behalf of children have a responsibility to be alert to possible abuse/neglect/exploitation and to record and report concerns without delay to the staff identified with child protection responsibilities within the school.

Local Authority Designated Officer (LADO)

The role of the Local Authority Officer (LADO) is to provide advice and preside over investigations of allegations or suspected allegations of abuse/neglect/exploitation, directed against anyone working at Bedford Greenacre Independent School.

Principal

The Principal of the school will ensure that:

- The policies and procedures are effectively implemented and followed by all the staff.
- Sufficient resources and time are allocated to enable the Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- Allegations of abuse/neglect/exploitation or concerns that a member of staff or adult working in the school may pose a risk of harm to a child or young person are notified immediately (within 1 working day of the allegation being made) to the Local Authority Designated officer (LADO).
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regards to children, and such concerns are addressed sensitively, confidentially and effectively in a timely manner.
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns

and that, in certain circumstances, these concerns may need to be reported directly to Children's Social Care Services or the Police.

- The Safer Recruitment Guidelines are followed for all staff that come into contact with children.
- A referral is made to the Disclosure and Barring Service (DBS) of any person (whether employed, contracted, a volunteer or a student) who may have caused harm or posed harm to a child

Designated Safeguarding Lead / Deputy Designated Safeguarding Lead

The ultimate lead responsibility for safeguarding and child protection (including online/E-safety and understanding the filtering and monitoring systems/processes in place) is with the Designated Safeguarding Lead. This responsibility is not delegated. The responsibilities of the Designated Safeguarding Lead are found in Annex C of 'Keeping Children Safe in Education-Statutory Guidance for Schools and Colleges' – September 2025 and are outlined in Appendix 3.

Governing Body

In accordance with the Statutory Guidance 'Keeping Children Safe in Education' – September 2025, the Governing Body will ensure that:

- The school has a safeguarding/child protection policy, procedures and training in place which are effective, comply with the law and are in line with Bedford Borough Safeguarding Children Partnership procedures at all times. The policy is made available via our school website and on request.
- There is a nominated and trained governor with responsibility for Safeguarding Children and that this governor meets termly with the Safeguarding Team.
- The policies and procedures are reviewed annually.
- Any deficiencies or weaknesses in regards to Safeguarding arrangements that are brought to the attention of the nominated Governor /Governing Body are remedied.
- The Chair of Governors (or in the absence of the Chair, the Vice Chair) deals with any allegations of abuse/neglect/exploitation made against the Principal, in liaison with the LADO (Local Authority Designated Officer).
- The school operates safer recruitment practices including appropriate use of references and checks on new staff and volunteers. Furthermore, the Principal, a nominated Governor or another member of the Senior Leadership Team involved in the recruitment process have undertaken Safer Recruitment training.
- There are clear procedures for dealing with allegations of abuse/neglect/exploitation against members of staff and volunteers.
- There are senior members of the School's Leadership Team who are designated to take the lead responsibility for dealing with child protection (the DSLs).
- The DSLs undertake local training and that is refreshed every two years.
- The school shares information between professionals and local agencies to contribute to multiagency working in line with statutory guidance 'Working Together to Safeguard Children 2023'. Safeguarding arrangements take into account the procedures and practice of the Local Authority and the LSCP for Bedfordshire.
- Relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

School Business Manager

The SBM (in line with our recruitment policy) is responsible for producing, updating and maintaining the Single Central Register, carrying out Disclosure and Barring checks in accordance with *Safeguarding Vulnerable Groups*

Act 2006, undertaking Prohibition Order Checks, Section 128 checks and Disqualification declarations. When interviews are carried out the SBM is responsible for verifying identification of the candidates, collating evidence of qualifications, references and updating records when the appointment has been made. The SCR is kept on the SBM's computer, a hard copy is held in a file in the SBM's office and a back-up copy is held electronically on an external hard-drive. This record is checked at regular intervals by the Chair of Governors.

Bedford Greenacre Independent School undertakes to promptly report to the Disclosure and Barring Service (DBS), any person (whether employed, contracted, a volunteer or a student) if they have caused harm or posed harm to a child. Detailed guidance on when to refer to the DBS, and what information must be provided, can be found on [GOV.UK](https://www.gov.uk).

It is a requirement for all schools to check the suitability of their staff. At Bedford Greenacre Independent School all relevant staff undergo a Prohibition Order Check and Section 128 check to ensure they are not prohibited from teaching and/or taking part in management duties.

Staff at Bedford Greenacre Independent School are required to complete a self-declaration confirming they are not disqualified from working with children under the Childcare Act 2006 as amended in 2018. For further guidance, refer to: www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006

Staff Responsibilities

All staff have a responsibility to provide a safe environment in which children can learn. All staff should be prepared to identify children who may benefit from Early Help.

Any staff member who has a concern about a child's welfare should follow the referral systems and processes set out in this document. Staff should expect to support social workers and other agencies following any referral. In particular, all staff **must**:

- Read and understand the Part 1 of 'Keeping Children Safe in Education-Statutory Guidance for Schools and College Staff' – September 2025. Members of staff working directly with children **must** also read Annex B.
- Ensure this Safeguarding Policy is read and understood and attend regular safeguarding staff training.
- Know the identity of and understand the role of the DSL/Deputy DSL
- Immediately report and document any Safeguarding Children and or welfare concerns to the DSL/Deputy DSL, the Principal or in urgent circumstances IFD/police.
- Be aware of the process for making referrals to children's social care and for statutory assessments for both *Children in need* and *Children suffering, or likely to suffer, significant harm* that may follow a referral along with the role they might be expected to play in such assessments (refer to flowchart in Appendix 6).
- Read and implement all the relevant school policies outlined in this document.
- Inform the Principal and LADO immediately (within 1 working day of the allegation being made) if an allegation is made against a member of staff (including the DSL/Deputy DSL, supply staff and volunteers).
- Pass on any low-level concerns and allegations and 'blow the whistle' on poor or unlawful practice. Failure to report safeguarding concerns will become a disciplinary matter.
- Monitor and report pupil attendance concerns and alert the DSL/Deputy DSL to any Safeguarding concerns.
- Ensure that the *Staff Code of Conduct* policy is read and followed.

Record Keeping

Well-kept records are essential to good child protection practice. Clear records of what has been said, any injuries or marks on the child are documented on the school online form. The DSL is responsible for these records and for passing on any concern, allegation or disclosure to other agencies.

- Records relating to actual or alleged abuse/neglect/exploitation are stored separately from normal pupil or staff records.
- Child protection records are stored securely with access confined to specific staff e.g. the DSL/deputy DSL and the Principal.
- Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring they are acted upon.
- When a child transfers to another school or college copies of all their child protection records are also transferred separately from other records. Evidence of receipt of these records by the next school is obtained. Records that need to be posted are sent by registered post. Verbal contact will be made if this is necessary to ensure that support will be in place for a child before they transfer. Original documents are kept until the child has reached 25 or 75 if the child is a looked after child. Files requested by other agencies e.g. the Police are copied and shared as appropriate.

Confidentiality

At Bedford Greenacre Independent School we recognise that all matters relating to Safeguarding Children are confidential and staff are informed on a need to know basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. Confidentiality cannot be promised to a pupil giving evidence or making a disclosure.

Support for Pupils

If abuse/neglect/exploitation is suspected, accurate information will be given only to the DSL/deputy DSL. Other staff are given only enough information to prepare them to act with sensitivity to a distressed child. The school recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may experience feelings of helplessness, humiliation or self-blame. The school will endeavour to support the child through the provision of a positive, supportive and secure environment together with the provision of a curriculum content which supports self-esteem and self-motivation.

Support for Staff

The school recognises that staff working in school who have become involved in dealing with a child who has suffered harm or appears likely to suffer harm may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through their anxieties with the DSL or other senior member of staff and to seek further support if it is deemed necessary.

Working with parent/carers

The school will:

- Ensure that parents/carers have an understanding of the responsibility placed on the school and staff for safeguarding by setting out its obligations in the policy which is published on the school website.
- Undertake appropriate discussion with parents/carers prior to involvement with other agencies (e.g. IFD, Children's Social Care) unless to do so would place the child at risk of harm, or compromise any investigation.

Other Relevant Policies

The statutory responsibility for safeguarding the welfare of children goes beyond child protection. This policy therefore complements and supports a range of other policies and procedures. These include:

Behaviour policy	Racism Policy
Anti-Bullying Policy	Physical Contact and Restraint Policy
Special Education Needs Policy	Educational Trips and Visits Policy
First Aid Policy and Medicine Policy	Children Missing Education
Health and Safety Policy	E-Safety & Acceptable Use Policy
Equal opportunities Policy	EYFS Policies and Procedures
Intimate Care Policy	Missing Pupil Policy
Whistleblowing Policy	Mental Health and Wellbeing Policy
Staff Handbook & Staff Code of Conduct	Prevent Policy
Recruitment and Selection of Staff	
Relationships Education, Relationships and Sex Education and Health Education Policy	

This list is not exhaustive but when undertaking development or planning, the School considers the implications for safeguarding and promoting the welfare of children.

Recruitment and Selection of Staff

At Bedford Greenacre Independent School the safer recruitment processes are based on the statutory guidance *'Keeping Children Safe in Education-Statutory Guidance for Schools and Colleges'* – September 2025. The school will provide all the relevant information in references for member of staff about whom there have been concerns about child protection/inappropriate conduct. On every interview panel for school staff at least one member (teacher/manager or governor) will have undertaken safer recruitment training. Safer recruitment includes examining 'gaps' in a person's employment history and ascertaining reasons for such gaps.

Disclosure and Barring checks are carried out in accordance with Safeguarding Vulnerable Groups Act 2006, together with Prohibition orders (as described in the Teacher Regulation Agency – TRA guidance), Section 128 checks and Disqualification declarations.

When recruiting, the school will only accept a CV if it is accompanying an application form. We will not accept a CV on its own. We will carry out online searches on any short-listed candidates and where possible, seek references before interview.

Induction Process

All staff newly appointed to Bedford Greenacre Independent School **must** read and understand the Part 1 of *'Keeping Children Safe in Education-Statutory Guidance for Schools and College Staff'* – September 2025 as well as Annex B. All newly appointed staff are informed about the procedures, documentation and routines of the school. They are provided with a copy of this policy and *'Keeping Children Safe in Education-Statutory Guidance for Schools and Colleges'* – September 2025.

This is outlined in our Induction of New Teaching Staff Policy.

The process includes:

School structure and ethos	Staff Code of Conduct
Safeguarding Children	Pupil Behaviour Policy
Staff Handbook	Policies and Procedures
Events and Trips	Identity & Role of DSL/Deputy DSL
E-Safety Policy and Acceptable Use Policy	Whistleblowing Policy
Health and Safety: Fire Regulations / Site security	Mental Health and Wellbeing Policy
Children Missing Education Policy	
Anti-bullying policy (including cyber, prejudiced-based and discriminatory bullying)	

This induction process also applies to learning support staff, student teachers and other adults employed to work with our children on a regular basis.

Visitors

Red or Green lanyards are worn by all visitors to the school: Green lanyards are worn by visitors who have had safeguarding checks and therefore do not need to be accompanied by a member of staff. These visitors must provide photographic identification and proof of DBS. Red lanyards are worn by all other visitors and must be accompanied by a member of staff at all times.

All visiting speakers are checked as suitable prior to arriving in school (whether invited by staff or pupils) and supervised by a member of staff. Visitors will be supervised at all times, the school may undertake internet searches on them and possibly see their presentation in advance to check content is suitable.

Use of school premises for non-school activities

Where governing bodies or proprietors hire or rent out school facilities / premises to organisations or individuals (for example community groups or sports associations) they should ensure that appropriate arrangements are in place to keep children safe.

The governing body should therefore seek assurance that the provider 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 for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body or 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.

As with any safeguarding allegation, if we have cause for concern, we will follow our safeguarding policy and procedures, including informing the LADO.

E-Safety

The Department for Education has published a list of Filtering and Monitoring Standards for 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>. These are to:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.

The DSL/Deputy DSL have a lead responsibility for E-Safety in the school. They work closely with the IT Technician to ensure these standards are met. More information can be found in our E Safety and Acceptable

Use Policy. Our appointed Governor with responsibility for Safeguarding (including E Safety) and DSL also review the standards to ensure these are met. The full governing body at Bedford Greenacre Independent School, led by the safeguarding governor, will annually review the effectiveness of filters and the monitoring system; asking the following questions – who is responsible for filtering and monitoring and keeping systems up to date? Who checks and responds to any breaches? How frequently is this done? How is this recorded? Who decides what is inappropriate and harmful content?

At Bedford Greenacre Independent School we understand the importance of E-Safety and have appropriate filtering and monitoring systems/processes in place. Our procedures and rules governing the use of new technologies, internet and electronic communications, publishing and the appropriate use of personal data are clearly stated in our E-Safety Policy. Online Safety policies and procedures are in place to limit children's exposure to the following risks:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **Conduct** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

In order to ensure the safety of our children and ensure they are protected from potentially harmful and inappropriate online material, we have filtering systems in place to monitor and control the use of school communication systems. However, we work hard to ensure that our blocking system does not lead to unreasonable restrictions for online teaching and Safeguarding. Online safety is included as part of providing a broad and balance curriculum and is part of the content in PSHCE and RSHE lessons. For further details regarding online safety at Bedford Greenacre Independent School refer to our E-Safety & Acceptable Use Policy.

As outlined in our E-Safety Policy personal mobile electronic communication devices and cameras belonging to staff or visitors are not to be used when in the presence of EYFS children.

Whistle blowing

We provide an environment in which children and adults feel confident to express concerns regarding the behaviour of a member of staff. If any member of staff is concerned or hears about allegations made against another member of staff, the DSL/Deputy DSL, volunteers or the Principal which he/she feels cannot be dealt with by any means already described in this policy then he/she should contact the Chair of Governors or the lead Governor with responsibility for safeguarding/welfare. They will inform the Local Safeguarding Children Partnership. Alternatively, other whistleblowing channels may be used e.g. the NSPCC whistleblowing helpline 08000280285 (8am to 8pm Monday – Friday) or email help@nspcc.org.uk. For further details, refer to our Whistleblowing Policy.

Low level concerns

Any inappropriate, problematic and concerning behaviour by a member of staff will need to be shared with the Principal immediately who should have an overview of all concerns and make the final decision. It may be appropriate for the Principal to work in collaboration with the DSL and/or LADO. If in doubt, the LADO should be consulted. Written records should be kept with reasons for decisions.

EYFS

For our EYFS registered setting. We will inform Ofsted of allegations against people living or working at the school, or of any other abuse alleged to have taken place on the school premises as soon as practicable and within 14 days at the latest. Our Nursery Provision based on Kimbolton Road is an Ofsted registered EYFS setting.

Children Missing Education (Unexplainable and/or persistent absences from education)

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.

Absence 'for prolonged periods and/or on repeat occasions' is a 'vital warning sign to a range of safeguarding issues'. A child missing education from school due to repeated or unexplained absence, or by leaving the school unexpectedly is a potential indicator of abuse, neglect and/or exploitation, or where a family may be in need of additional support.

Working together to improve school attendance (DfE August 2024) states that schools should have procedures in place which:

- **Expect:**
Develop and maintain a whole school culture that promotes the benefits of high attendance
Clear attendance policy which staff, pupils and parents understand
- **Monitor:**
Accurate admission and attendance registers – informing the Local authority when pupils leave
Effective day to day processes to follow-up absences (including having two contacts for each pupil)
Regular analysis of attendance and absence data to identify pupils or cohort that require support with attendance and effective strategies
- **Listen and understand:**
Strong relationships with families – listen and understand barriers
Work together to remove/resolve them
- **Facilitate support:**
Early help
Information sharing and collaborative working (including Local Authority involvement)

The school carries out daily registration and absences are dealt with in accordance with the school Attendance Policy. This section covers those instances where:

- there is a repeated pattern of absence
- the reason for absence is unclear or unexplained
- a member of staff has concerns about the nature of a pupil's absence.

In these instances, the DSL/Deputy DSL should be consulted and, if appropriate, a Cause for Concern Form completed. The DSL/Deputy DSL will then follow the procedure outlined in this policy and notify the relevant Local Authority Children Missing Education Officer. For further details, refer to our Children Missing Education Policy.

Child's Voice

Our Class/Form Teachers are uniquely placed to ensure that pupils have an opportunity to be listened to. This is supplemented by the systems outlined in our Mental Health and Wellbeing statement. We have two visiting school counsellors who pupils can go and talk to along with worry boxes around school that are checked regularly and dealt with by members of staff. There are also notices displayed in every tutor room highlighting the various people (including our counsellors and their contact details) who our pupils could turn to if they need to talk to someone. Where there is a Safeguarding concern Bedford Greenacre Independent School ensure that the child's wishes and feelings are taken into account.



Appendix 1: Contact Information

Local Safeguarding Partnerships

Local Safeguarding Partnership (LSCP) Bedford Borough	https://llchildandfamilies.bedford.gov.uk/web/portal/pages/home Emergency Duty Team: 0300 300 8123
Integrated Front Door (IFD) – previously Multi-Agency Safeguarding Hub (MASH) and Early Help Hub	Multiagency@bedford.gov.uk 01234 718700
Children Social Care Bedford Borough	01234 223599
Social Care Emergency Duty Team (EDT) Bedford Borough	0300 300 8123
Central Bedfordshire Access and Referral Hub	cs.accessandreferral@centralbedfordshire.gov.uk 0300 300 8585
Luton Multi Agency Safeguarding Hub (MASH)	mash@lutongcsx.gov.uk 01582 547653
Cambridge County Council Child Protection Team	Referral.Centre2@cambridgeshire.gov.uk Or referralcentre.childrens@cambridgeshire.gcsx.gov.uk 0345 045 5203 (8am and 6pm Monday to Friday). Outside office hours, call the First Response and Emergency Duty Team: 01733 234 724
Northamptonshire Multi-Agency Safeguarding Hub (MASH) and Child Protection Team	MASH@northamptonshire.gcsx.gov.uk 0300 126 1000 Outside office hours: 01604 626938
Buckinghamshire First response Team	cypfirstresponse@buckscc.gov.uk 0845 460 0001
Milton Keynes MASH	children@milton-keynes.gov.uk 01908 253169 or 253170.
Government website for local children's social care contact information	www.gov.uk/report-child-abuse-to-local-council

LADO

Bedford Borough LADO	LADO@bedford.gcsx.gov.uk 01234 276693
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Police

Bedfordshire Police	999 (emergency number) or 101 (non-emergency number)
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Domestic Violence (Operation Encompass)

For Urgent Safeguarding issues contact IFD	
For non-urgent matters	OpEncompass@bedfordshire.pnn.police.uk or 01234 842631

Prevent

Advice and guidance in relation to safeguarding individuals who are susceptible to radicalisation and children who may be at risk through living with or being in direct contact with known extremists:

Bedfordshire Police Prevent contact: DS Helen Brooke (DS for Beds and Central Beds)	Prevent@bedfordshire.pnn.police.uk
DfE dedicated telephone helpline & mailbox for non-emergency advice & guidance about extremism	ddced.spoee@education.gov.uk 02073407264

FGM

In cases of Female Genital Mutilation (FGM) it is mandatory to report to the police cases where it appears that an act of FGM has been carried out:

Bedfordshire Police	999 (emergency number) or 101 (non-emergency number)
National Society for the Prevention of Cruelty to Children (NSPCC)	0800 028 3550 – a dedicated FGM helpline

Forced Marriage

Forced Marriage Unit (FMU)	020 7008 0151 fmufco@fco.gov.uk fmuoutreach@fco.gov.uk (for outreach work)
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NSPCC

NSPCC	0808 800 5000
NSPCC Whistleblowing Helpline	help@nspcc.org.uk 0800 028 0285 (8am to 8pm Monday – Friday)

Appendix 2a: Signs and Definitions of Abuse, Neglect and/or Exploitation

What is Child Abuse?

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, including when they see, hear or experience its effects. 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.

Some of the following signs might be indicators of abuse, neglect and/or exploitation:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers; Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricate the symptoms or deliberately induces illness in a child.

Sexual Abuse

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 (e.g. 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 referred to in Appendix 2b.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food and clothing, shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use or inadequate care takers); 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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development, it may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far 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 interaction 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, though it may occur alone.

Appendix 2b: Specific Safeguarding Issues

Fundamental British Values form part of our school ethos. Pupils are able to raise concerns with either their Class/Form Tutor or a member of the SLT team.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. Annex B of KCSIE 2023 contains important additional information about specific forms of abuse and safeguarding issues:

- Children in the Court System
- Children Missing from Education
- Children with Family Members in Prison
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- County Lines
- Domestic Abuse, including when children see, hear or experience its effects
- Homelessness
- So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage) • FGM
- Forced Marriage
- Preventing Radicalisation
- The Prevent Duty
- Channel
- Child on child Abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting

Children who are disabled and have specific additional needs and/or who have special educational needs (whether or not they have a statutory education, health and care plan)

Additional barriers can exist when recognising abuse, neglect and/or exploitation in this group of children. This can include:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury relate to the child's condition without further exploration;
- These children being more prone to peer group isolation or bullying (including prejudiced-based bullying) than other children;
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges.
- Being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school and not understanding the consequences of doing so.

Staff understanding and knowledge of our children helps them to differentiate between indicators of possible abuse and behaviours which relate to the child's disability/special need.

Looked After Children (and previously Looked After Children)

We ensure that all staff have awareness of issues around the safeguarding of this particularly vulnerable group of children. All appropriate staff have the information needed in relation to a child's looked after status and care arrangements. The DSL/Deputy DSL will have details of the child's social worker and the name of the virtual school head in the relevant education authority. DSL/Deputies are trained in LAC by the LA. The DSL/Deputy DSL will monitor the education achievements of Looked After Children in our school and have received Looked After Children training from the LA

Dedicated governors have had safeguarding training as well as LAC training.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL and Deputy DSL 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, and serious youth violence.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. **This is a criminal offence.**

Female genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs and includes honour based violence. It is illegal in the UK under the terms of the Serious Crime Act 2015 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.

Indications that FGM may be about to take place:

- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent
- Parents seeking to withdraw their children from learning about FGM.

Indications that FGM may have already taken place:

- A girl may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school.

The above lists are not exclusive.

In cases of FGM it is **mandatory** to report to the police cases where it appears that an act of FGM has been carried out.

Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and

the use of social media in particular has become a major factor in the radicalisation of young people.

Channel is a programme which focuses on providing support at an early stage to those who are susceptible to being drawn into terrorism. It is part of the Prevent strategy and provides a mechanism for all schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. Any referrals will need the individual's consent. The process is a multi-agency approach to identify and support individuals at risk of being drawn into terrorism.

The following issues can make individual children and young people vulnerable to radicalisation:

- **Identity Crisis:** Distance from cultural / religious heritage and feeling uncomfortable with their place in the society around them;
- **Personal Crisis:** Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;
- **Personal Circumstances:** Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- **Unmet aspirations:** Perceptions of injustice; feeling of failure; rejection of community values;
- **Criminality:** Experiences of imprisonment; previous involvement with criminal groups.

Possible signs:

- General changes of mood, patterns of behaviour, secrecy;
- Changes of friends and mode of dress;
- Use of inappropriate language;
- Possession of violent extremist literature;
- The expression of extremist views;
- Advocating violent actions and means;
- Association with known extremists;
- Seeking to recruit others to an extremist ideology.

Through our PSHCE programme and pastoral care system, Bedford Greenacre Independent School support pupils to build resilience towards radicalisation and extremism. Our staff know the children well and use their daily interactions to monitor behaviour and be vigilant towards children at risk of radicalisation. We assess the general risk of children being drawn into terrorism, and identify who maybe at risk of radicalisation. If a pupil is identified, the normal Safeguarding policies and procedures will be followed.

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since February 2023, no one under the age of 18 may get married.

The pressure put on individuals to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

The Anti-social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)
- Breaching a Forced Marriage Protection Order is also a criminal offence
- The civil remedy of obtaining a Forced Marriage Protection Order through the family courts will continue to exist alongside the new criminal offence, so victims can choose how they wish to be assisted

Suspected abuse / allegation of abuse by one or more pupils against another pupil (child on child abuse)

Bedford Greenacre Independent School has a zero-tolerance approach to abuse. Staff understand that children can abuse children and that this form of abuse will not be tolerated or passed off as *'banter'*, *'just having a laugh'*, *'part of growing up'* or *'boys being boys'* as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The school reassures victims that they are being taken seriously and that they will be supported and kept safe so that no victim is given the impression that they are creating a problem by reporting the abuse, sexual violence or sexual harassment and no victim is ever made to feel ashamed for making a report.

Staff challenge any abusive behaviours between peers.

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

- bullying (including prejudice-based bullying, discriminatory bullying and cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment inside or outside school or online;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- initiation/hazing type violence and rituals;
- upskirting;
- abuse in intimate personal relationships between children;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside the school. All staff, but especially the DSL/Deputy DSL will consider the context within which such incidents and/or behaviours occur. Bedford Greenacre Independent School has procedures in place to minimise incidents of child on child abuse taking place. Our comprehensive PSHCE provision and behavioural expectations help to support this. During our pupil induction process, children are made aware of the school's:

- E-Safety Acceptable Use Agreement
- Behaviour and Sanctions Policy
- Anti-bullying/Racism Policy

At Bedford Greenacre Independent School we respond swiftly to and address any kind of sexual harassment and online sexual abuse by following the processes outlined in this policy. Through our daily interactions with pupils, staff model respectful and appropriate behaviour. Our PSHCE programme (and in particular our RSHE curriculum) helps our pupils to be clear about what is acceptable and unacceptable behaviour. Sanctions and interventions (as outlined in our Behaviour Policy) are used to tackle poor behaviour and provide support for pupils who need it. Systems are in place for pupils to ask for help and support and confidently report abuse, knowing their concerns will be treated seriously.

We understand that girls are more likely to be the victims of child on child abuse, however we recognise that all such abuse is unacceptable and will be taken seriously.

The school works in partnership with parents, and pupils who are identified as posing a potential risk are supported by a variety of appropriate strategies including access to the School Counsellor and/or small group Social Skills sessions.

In all cases, the Principal/DSL/Deputy DSL must be informed immediately. In the event of disclosure about child on child abuse, all children involved, whether perpetrator or victim, must be considered as being 'at risk' and will be provided with appropriate support by a key member of staff identified by the pupil.

Support may include access to the School Counsellor. The DSL/Deputy DSL will refer to the Bedfordshire LSCP Threshold Guidance to determine the appropriate course of action. Staff are aware that children with SEN/D and/or LGBT children may be particularly vulnerable.

All cases will be treated as Safeguarding issues and the procedures outlined in this policy will be followed. Members of staff should also refer to our Anti-Bullying Policy for further guidance. Recording of these incidents should follow the procedures outlined in Appendix 5.

In the case of sexualised behaviours, staff utilise the *Healthy-Problematic-Harmful* Traffic Light System to help analyse the behaviour and determine the most appropriate response. Staff will consider:

- The wishes of the victim in terms of how they want to proceed
- The nature of the alleged allegation
- The ages and developmental stages of the children involved
- Any power imbalance between the children
- Whether the incident is a one-off or a sustained pattern of abuse
- Whether there are ongoing risks to the victim, other children or staff
- Contextual safeguarding issues.

Sexualised behaviours are recorded on CPOMs. At Bedford Greenacre Independent School, we recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is not being reported.

The Human Rights Act (1998) and the Equality Act (2010) set out the fundamental rights and freedoms that everyone in the UK is entitled to, including the right to education. Being subjected to any form of harassment, violence and/or abuse, including that of a sexual nature, may breach these rights, depending on the nature of the conduct and the circumstances.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In

some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse 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. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

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". 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.

Children who are lesbian, gay, bisexual, or gender questioning

The fact that a child or a young person may be is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Staff at Bedford Greenacre Independent School will endeavour to reduce these additional barriers faced by students and provide a safe space for them to speak out or share their concerns with members of staff. LGBTQ+ is part of the statutory Relationships education, Relationship and Sex Education and Health Education curriculum which educates pupils to counter homophobic, biphobic and transphobic bullying and abuse.

Appendix 3: Role of the Designated Safeguarding Lead / Deputy Safeguarding Lead

(from Annex C of 'Keeping Children Safe in Education-Statutory Guidance for Schools and Colleges'
– September 2025)

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online/E-safety and understanding the filtering and monitoring systems/processes in place). This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively.

Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children. They must ensure that there is an appropriate adult involved in any police investigations on school site so that the rights and welfare of the young person are safeguarded. They are expected, amongst other things, to support and advise the young person, observe whether the police are acting properly and inform a senior officer if they are not.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, it is a matter for individual schools working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse, neglect and/or exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and where a crime may have been committed to the Police as required. NPCC – When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Principal to inform him of issues– especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENDCOs), or the named person with oversight for SEND in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- liaise with the senior mental health lead, Emma Brewer (Assistant Headteacher – Pastoral, DSL) and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school. This includes:
 - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
 - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should 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; We recognise that in some settings there may be a different strategic lead for promoting the educational outcomes of children who have or have had a social worker, particularly in larger schools. Where this is the case, it is important that the DSL works closely with the lead to provide strategic oversight for the outcomes of these children and young people.
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of the KCSIE September 2025 guidance.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as DSL’s and SENDCOs or the named person with

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oversight for SEN in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners; *Full details in Chapter one of Working Together to Safeguard Children. 146 Section 17(10) Children Act 1989: those unlikely to achieve a reasonable standard of health and development without local authority services, those whose health and development is likely to be significantly impaired without the provision of such services, or disabled children.*
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the

- capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of the Keeping Children Safe in Education document, September 2025, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018, Data (Use and Access) Act 2025 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as the Local Authority Children's Social care or the Prevent programme etc.).

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead understand and use the 7 golden rules for sharing information as set out in *Information Sharing. Advice for Practitioners providing safeguarding services to children, young people, parents and carers*, DfE May 2024.

Appendix 4: Guidance for Staff in the event of a disclosure being made

Child's Voice

Where there is a Safeguarding concern Bedford Greenacre Independent School ensure that the child's wishes and feelings are taken into account.

The following guidance is given to staff, volunteers and other adults if they are the first point of contact for the information from a child:

- a) Ask the child to tell you about all the details which they can remember and listen carefully. Ask for clarification if necessary but be careful not to ask leading questions or put words into his/her mouth. Do not suggest events or speculate on peoples' actions. You must not promise confidentiality to a child who wishes to disclose information on possible abuse. It is important to remind the child that you will have to pass on their concerns.
- b) Make notes if you can, as you are being told the information. If this is not possible, do it as soon as you can. Try to use verbatim quotes- do not interpret what the child has said. Avoid asking leading questions. When asking questions always use open questions using the tell me, explain to me, describe to me system (TED principle).
- c) When the child has finished telling you his/her account, read or relate the details back to the child to confirm that you have understood the details correctly.
- d) Discuss with the child what action might be taken next and the possibility of disclosure to the relevant agencies.
- e) Remove the child from any threatening or embarrassing situation and comfort them if they are in distress. Do not put your arm around the child as this may not be appropriate. Be sure to use age-appropriate and sympathetic language and try to reassure them. Steps must be taken as appropriate to protect a child from further possible harm following a disclosure.
- f) Pass on the information to the DSL/Deputy DSL as soon as you can and enter the information onto CPOMs.
- g) If the abuse you are made aware of is by one or more pupils against another pupil you should follow the guidance above and consult the anti-bullying policy.
- h) You must ensure that your behaviour and actions do not place pupils or you at risk of harm or of allegations of harm to a pupil (for instance, in one to one tuition, sports coaching, conveying a pupil by car/ minibus, engaging in inappropriate electronic communications with a pupil etc.)
- i) If you hear third-hand about a situation e.g. the third party is a form tutor, a friend, a neighbour etc.: you must
 - Write down any details you know, when you heard the information and from whom etc. and pass it to the DSL/Deputy DSL as soon as possible and enter the information onto CPOMs.
 - Keep a copy of what you gave to the DSL yourself.

We have a duty to respond to both **Children in Need and **Children Suffering or Likely to Suffer Significant Harm**. In order to ascertain the appropriate response, the DSL / Deputy DSL will refer to the Bedford Borough Multi-Agency Thresholds Document. This document outlines how to access local services and the type of help to be provided. It also includes the level of need for when a child should be referred to the local authority children's social care for assessment and for statutory services. In all cases, the school will act immediately by seeking the advice and/or referring children.**

Children in Need

Where children and families need support from agencies beyond our school, we will respond according to our local Early Help Service procedures to ensure there is an inter-agency assessment such as the Early Help Assessment (EHA). The EHA will help us to identify what the child needs. We will liaise closely with Bedford Borough Early Help Service, including acting as lead professional to coordinate support, with the agreement of the child and their parent/carer(s), and in accordance with Bedford's Early Help Strategy.

Children Suffering or Likely to Suffer Significant Harm

If our concern is of an immediate safeguarding nature, then our Safeguarding procedures outlined in this policy will be followed.

Appendix 5: Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a child

General

1. The Local Safeguarding Children Partnership for Bedfordshire Procedures contain the interagency processes, protocols and expectations for safeguarding children. (Available on the LSCP website). The DSL is expected to be familiar with these, particularly the referral process.
2. It is important that all parties act swiftly and avoid delays.
3. Any person may seek advice and guidance from MASH particularly if there is doubt about how to process. Any adult, whatever their role, can take action in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
4. A full written record must be made detailing what has been alleged, noticed and reported, and kept securely and confidentially using CPOMs.
5. In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and the relevant parties to help alleviate the concerns and effects an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and require assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent /carer of a referral that might put the child at risk, and in individual cases advice from Children's Social Care will need to be taken.
6. **In cases of FGM it is mandatory to report to the police cases where it appears that an act of FGM has been carried out. The procedures below should still be carried out and the DSL/Deputy DSL will inform the police.**

Individual Staff/ Volunteers/Other Adults (including contractors) – main procedural steps

1. When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children or promise confidentiality. Children making disclosures should be reassured and if possible at this stage should be informed what action will be taken next.
2. As soon as possible write a dated, timed, and signed note of what has been disclosed or said or done and report to the DSL in the school.
3. If the concern involves the conduct of a member of staff (including the DSL/Deputy DSL), supply staff or volunteer, visitor, contractor, governor, trainee of another young person or child, the Principal must be informed immediately; they will then immediately contact the LADO to seek advice (within 1 working day of the allegation being made).
4. If the allegation is about the Principal, the information must be passed to the Chair of Governors, without informing the Principal, who will immediately inform the LADO (within 1 working day of the allegation being made).
5. Depending on the age of the child, he/she needs to be informed about the actions you have taken.

DSL – Main Procedural Steps

1. Begin a case file for pupils where there are concerns, with an overview chronology, which will hold a record of communications and actions. This must be stored securely.
2. Where initial enquiries do not justify a referral to the investigating agencies inform the initiating adult

and monitor the situation. If in doubt seeks advice from the MASH/IFD.

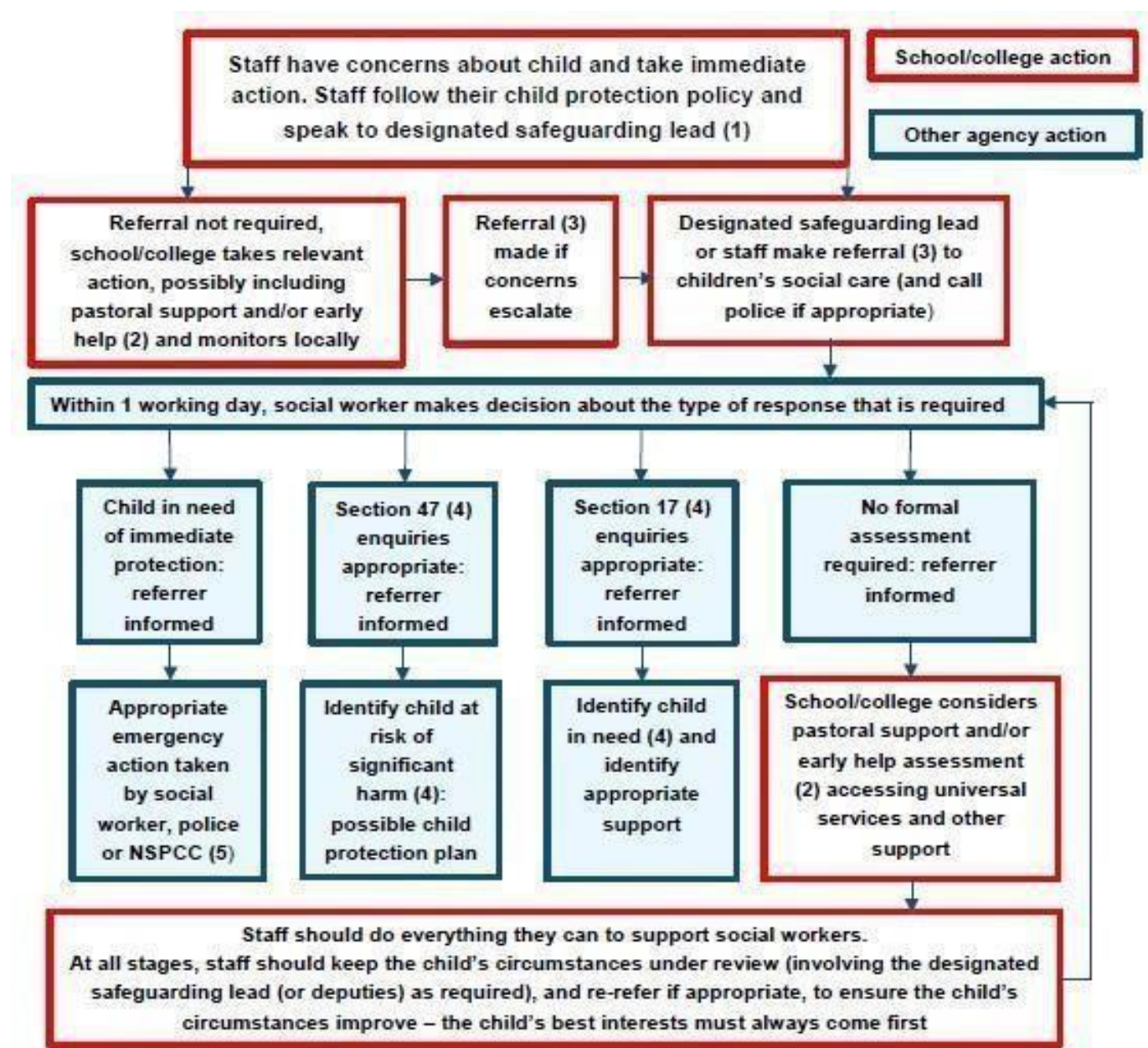
3. Share information confidentially with those who need to know.
4. Where there is a child protection concern requiring immediate, same day, intervention from Children's Social care, this department should be contacted immediately by phone. Written confirmation should follow within 24 hours on the LSCB agency referral form. All other referrals should be made first through a telephone conversation and then by following up with the online form if and when requested to do so. *Telephone numbers are to be found in appendix 1.*
5. If it appears that urgent medical attention is required arrange for the child to be taken to hospital (this will require calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.
6. Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving the school premises, take advice from Children's Social Care on whether to contact the Police. Remain with the child until the Social Worker or Police take responsibility. If in these circumstances a parent arrives to collect the child, the member of staff has no right to withhold the child unless there are current legal restrictions in force (e.g. a restraining order). If there are clear signs of physical risk or threat, the Children's Social Care team should be updated and the Police should be contacted immediately.

Staff are reminded that anyone can make a referral to Children's Social Care if they are worried about a child. If at any point, staff are worried that a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately.

They should not seek parental consent in cases where they consider to do so may increase the risk of harm to the child. In cases where they have concerns for a child's welfare which indicate that they are at a level that may require an assessment by children's social care, if having informed the parents you are making a referral and consent has not been given, a referral can still be made. The MASH team will consider if/what information needs to be shared to ensure the child's needs are being met.

Where referrals are not made by the DSL or Deputy DSL, they should be informed immediately that a referral has been made.

Appendix 6: Flowchart of actions where there are concerns about a child



Appendix 7: Procedure in the event of an allegation being made against a member of staff, volunteers, supply staff, students, other adults (including contractors) and the Principal

It is recognised that whilst Bedford Greenacre Independent School's staff are uniquely placed to detect signs and indicators of child abuse, they are themselves particularly vulnerable to malicious or misplaced allegations made by children either deliberately or innocently, arising from normal association with them in school.

When a child makes an allegation of abuse by a member of staff, the person receiving the allegation must take it seriously and deal with it by informing the Principal (if the allegation is not against that person). The Chair of Governors must also be immediately informed. The Principal may choose to inform the DSL.

In cases where the Principal is absent or is the subject of the allegation or concern, the Chair of Governors must be informed.

In all cases of allegations or concerns against a member of staff, volunteers, students, other adults and the Principal, the Bedford Borough LADO must be informed. No investigation will be made prior to LADO being informed.

Contact details can be found in Appendix 1.

What to do when an allegation is made against a member of staff (including the DSL or Deputy DSL) / volunteer / supply staff / student / any other adults (including contractors) / Principal):

If an allegation is made against an employee of, volunteer or other adult at Bedford Greenacre Independent School, the following action will be taken:

- Principal (if the allegation is not against that person) must be informed **immediately** that an allegation has been made. In the Principal's absence, the Chair of Governors must be informed
- Bedford Borough LADO will **immediately** be contacted (within 1 working day of the allegation being made) to discuss a course of action and notify the Police if deemed necessary
- In addition to this and in the case of allegations being made against supply staff, the supply agency will also be kept fully informed and involved
- In the event that an allegation is made against the Principal the matter must be reported immediately to the Chair of Governors, without the Principal being informed
- In the case of allegations being made against the Principal, the Chair of Governors will immediately contact Bedford Borough LADO (within 1 working day of the allegation being made) to discuss a course of action and notify the Police if deemed necessary.
- Following agreement with the LADO, the member of staff/volunteer/student/other adult against whom the allegation is made will be suspended
- Immediate contact should also be made with the Intake and Assessment Team at Children's Services now available via IFD
- Notify Ofsted of any allegation against people working at the school, or of any other abuse alleged to have taken place on the premises, as soon as practicable and within 14 days at the latest (only required for our EYFS setting on the Kimbolton Road site)
- No discussions are to be held at this stage with the member of staff concerned.

Ofsted and/or the Intake and Assessment Team and/or LADO will advise further on the action that Bedford Greenacre Independent School should now take with regard to the member of staff.

At this stage, Bedford Greenacre Independent School may talk to the member of staff concerned but should not

interview the child until Ofsted and/or the Intake and Assessment Team and/or LADO give the go-ahead. Depending on the outcome of these investigations the Disciplinary Procedure will be followed. Confidentiality should be maintained throughout this matter, in order that any subsequent investigation is not prejudiced.

Bedford Greenacre Independent School staff:

1. cannot promise total confidentiality to children since they must inform the Principal and/or the Senior Management Team (as above);
2. must make a written note of the allegation/concerns including a note of anyone else witnessing the incident. Witnesses should also make a record, these will be signed and dated;
3. will only establish what the child is saying and will not interview the child about the allegation;
4. who have any reason to suspect that a child may have been abused by another member of staff, must immediately inform either the Principal or the Chair of Governors.

Where suspicions or allegations of abuse against a child attending Bedford Greenacre Independent School and involving members of Bedford Greenacre Independent School staff are received by a person outside the group e.g. social worker, Police, by a parent, relative or family friend, then the Principal and/or Senior Leadership Team should be informed as soon as possible and immediately follow the above procedure. The person to whom the allegation has been made may already have contacted Ofsted and/or the Intake and Assessment Team.

In the event of a third party hearing the allegation Bedford Greenacre Independent School staff should:

1. obtain details of the allegation in writing, signed and dated by the person who received the allegation (not the child who is the subject of the allegation);
2. record any information about times, dates, locations and names of potential witnesses;
3. establish whether Ofsted and the Intake and Assessment team have been informed about the allegation;
4. follow the main procedure outlined above.

Following completion of the investigation by Ofsted and the Intake and Assessment Team (IAT), there will be four possible courses of action:

Criminal	Ofsted and IAT will decide if there is sufficient evidence to carry forward a prosecution of the member and if so will involve the police directly.
Disciplinary	Ofsted and the IAT may determine that there is not sufficient evidence to press a criminal charge , but there may nevertheless be issues which require that disciplinary action is taken via the Setting's disciplinary guidelines.
Training	The investigations may indicate that the allegation was unfounded but the case may well have shown that there are issues of trainingand performance amongst staff which need to be dealt with by additional staff training.
Safeguarding Children	There may be other outstanding Safeguarding Children issues which do not involve the member of staff concerned but which Ofsted and IAT deem need to be dealt with via Safeguarding Children procedures. Where the allegation has been found to be without basis Ofsted and the IAT will write to the school summarising the outcome of the investigation.

'Lower level' Concerns and Allegations ('low-level' concerns)

This term refers to behaviour on the part of a staff member towards a pupil/pupils that is considered inappropriate and contrary to our Staff Code of Conduct.

Harms Test

Low-level concerns are differentiated from concerns that can cause harm. The harms test is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- 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 in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

Bedford Greenacre Independent School understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe, open, trusting and transparent environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

Low-level concerns are reported to the same persons as set out in this appendix in relation to concerns and allegations that meet the harms test.

Reports about supply staff and contractors are notified to their employers so any potential patterns of inappropriate behaviour can be identified.

Procedure for responding to 'low-level' concerns

The school promotes a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the Principal immediately in line with the procedures laid out in this Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible.

Low level concerns that should be reported include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door
- humiliating children

Staff members will be aware that concerns are still worth reporting even if they do not seem serious. Staff members will report their concerns to the Principal verbally or by submitting a written statement. Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Principal, it should be reported to the Chair of Governors.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Principal, who will, in turn, inform the employer.

When a low-level concern has been raised by a third party, the Principal will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

Reports of low-level concerns are recorded in writing, with details of the concern, the context in which it arose and action taken. The name of the person reporting is noted, respecting wishes to remain anonymous as far as reasonably possible.

Records of low-level concerns are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified, Bedford Greenacre Independent School will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms test is met.

We will consider if there are any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies will be revised or extra training delivered to minimise the risk of recurrence.

The rationale for all decisions and actions taken is recorded.

Referral to DBS and Teacher Regulation Agency (TRA)

We will make a referral to the DBS when a teacher/any member of staff in regulated activity has been dismissed or removed due to safeguarding concerns (or would have been dismissed had he/she not resigned) and their services have ceased to be used. We will also refer all cases, including alleged professional misconduct to the TRA and a prohibition order may be appropriate. (Further details can be found in 'Teacher misconduct: information for teachers', TRA April 2018.)

Important to note

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; no longer engaging /refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the DfE Independent School Registration and legal action taken. **'Compromise Agreements' cannot apply in this connection.**

This is a legal duty and failure to refer when the criteria are met is a criminal offence.

Records

For all allegations, other than those found to have been malicious or false, the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and (new) whether the outcome was substantiated, unsubstantiated or unfounded;
- a copy provided to the person concerned, where agreed by children's social care or the police;
- a declaration on whether the information will be referred to in any future reference.

Bedford Greenacre Independent School will make every effort to maintain confidentiality and guard against unwanted publicity.

Staff Conduct

In order to protect pupils and members of staff, we encourage staff to follow our professional **Code of Conduct**. This covers appropriate dress, the use of appropriate boundaries, social contact outside the setting (including on social networking sites), the receiving and giving of gifts and favouritism, and the safe use of technology.

Consideration needs to be given to:

- Being alone with the child / young person.
- Physical contact / restraint.
- Social contact outside setting / appropriate boundaries.
- Gifts and favouritism.
- Behaviour management.
- Intimate care.
- Safe use of technology (Security / Internet / mobile phones / digital images of children, etc).
- Appropriate use of social networking sites.
- We have a separate E-safety policy which outlines the acceptable use of electronic devices, however, consideration is needed for the increasing coverage of 4G and how this is providing unlimited and unrestricted access to online service.
- Staff must use school wifi to access mobile phone devices. Any devices capable of capturing or sharing images must not be used. As per staff code of conduct phones can only be used in the staffroom.