

Safeguarding and Child Protection Policy (Child in Need and Child in Need of Protection)

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

Academic Support Policy
Anti-Bullying Policy
Behaviour Policy
Online Safety Policy
Recruitment Selection and Disclosure Policy
Relationships and Sex Education Policy
Staff Code of Conduct
Whistleblowing Policy

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Safeguarding and Child Protection Policy

This statutory policy sets out the arrangements made by the proprietors of the School as required by the Independent School Standards and Regulations 2014; Section 87(1) of The Children Act 1989, Section 157 of the Education Act 2002 (and any guidance issue by the Secretary of State) to safeguard and promote the welfare of students at the school. This policy and its effectiveness will be fully reviewed at least annually by the Designated Safeguarding Lead (DSL) and the Compliance Committee; it will also be reviewed whenever new legislation or guidance are issued. It is designed to act as a handbook for safeguarding at BMS and therefore its contents may be subject to amendments in response to specific incidents or general trends both internal and external.

There is a significant amount of statutory guidance which the School has endeavoured to capture in this policy. To clarify, we will always look for the relevant guidance when dealing

with any situation in particular the School adheres to the Keeping Children Safe in Education Guidance at all times.

1. Key Contacts

Bedford Modern School

Head: Mr D Payne, head@bedmod.co.uk, 01234 332500
 DSL (Whole school): Mrs Jude Goodacre, jgoodacre@bedmod.co.uk, 01234 332500
 DDSL (Whole School): Mr Andrew Whomsley, awhomsley@bedmod.co.uk, 01234 332500
 DDSL (Years 7-8): Ms Laura Coltman, lcoltman@bedmod.co.uk 01234 332664
 DDSL (Years 9-11): Mr Paul Reynolds, preynolds@bedmod.co.uk, 01234 332564
 DDSL (Junior School): Mr Jonathan Bungard jbungard@bedmod.co.uk, 01234 332547
 DDSL and Mental Health Lead: Miss E Harbour eharbour@bedmod.co.uk, 01234 332664
 Nominated Safeguarding Governor: Dr Toni Munno nsg@bedmod.co.uk, 01234 332500
 Chair of Governors: Mrs Shirley Jackson sjackson@bedmod.co.uk, 01234 332500
 E-Safety co-ordinator: Mr David Donoghue ddonoghue@bedmod.co.uk, 01234 332500
 School Nurse: nurses@bedmod.co.uk, 01234 332505

Key Contacts	
Bedford Borough Integrated Front Door (IFD) (MASH) Out of hours	Multiagency@bedford.gov.uk 01234 718700 0300 300 8123
MASH Milton Keynes	children@milton-keynes.gov.uk 01908 253169 or 01908 253170
MASH Northamptonshire	0300 126 7000 (option 1)
Central Bedfordshire Central Bedfordshire Access and Referral Hub The Emergency Duty Team (EDT) For emergencies outside of working hours contact	0300 300 8585 0300 300 8123
Luton Rapid Intervention and Assessment Team Out of hours	mash@luton.gcsx.gov.uk 01582 547653 0300 3008125
LADO Bedford Borough	01234 276693 LADO@bedford.gov.uk
Prevent	0207 340 7464 Counter.extremism@education.gsi.gov.uk
Police Liaison	Richard Denton Richard.denton@beds.police.uk Daniel Sullivan Daniel.sullivan@beds.police.uk schoolsliasion@beds.police.uk
Senior Education Welfare Officer, Bedford Borough Education Support Services	David Blake Tel: 01234 276625 david.blake@bedford.gov.uk
CAMHS	Jo Meehan Tel: 01234 310040

	Jo.meehan@sept.nhs.uk
Prevent Duty Bedfordshire Police Contact	Richard Denton Tel: (101) or 01234 275206 Richard.denton@beds.police.uk Anti-Terrorism Hotline Tel: 0800 789 321 DfE Dedicated Contact Tel: 0207 340 7264 counter-extremism@education.gsi.gov.uk
Children Missing Education Officer	Debi Momi Tel: (01234) 228178, ext, 42178 debi.momi@bedford.gov.uk
NSPCC 24 Hour Helpline Childline	0800 800 5000 0800 1111

2. Statement

Bedford Modern School is fully committed to safeguarding and promoting the welfare of children defined for statutory purpose as: providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment whether that is within or outside the home, including online, preventing impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes, in line with KCSiE 2024.

At BMS, we aim to create a warm and supportive environment where students feel safe and secure. In all matters of safeguarding, we aim to respect and protect the rights of the individual as well as carefully considering how we support students with regards to particular protected characteristics¹. Equally **all** school staff will be fully trained, encouraged to share concerns, supported in their safeguarding role and encouraged to adopt an 'it could happen here' approach. The school will take action to promote a safeguarding culture amongst all members of its community and always act in the best interests of the child.

3. Policy Principles

This policy is one of a series of policies that sets out how the school will safeguard its students and enable all children to have the best outcomes. It sits above and works alongside the following policies:

- Anti-Bullying Policy
- Behaviour Policy
- Online Safety Policy
- Recruitment Selection and Disclosure Policy
- Staff Code of Conduct
- Whistleblowing Policy

This policy has been prepared using the guidance and principles set out in the following documents:

- [Behaviour in Schools: Advice for head teachers and school staff February 2024](#)
- [Children Missing Education August 2024](#)

¹ Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual orientation

- [Equality Act 2010 Advice for schools May 2014](#)
- [Guidance from Local Safeguarding Partners \(which include Bedford Borough, Central Bedfordshire and Luton as well as any other partners from the areas in which students from the School reside.](#)
- [Educate Against Hate - Prevent Radicalisation & Extremism](#)
- Guidance on Safer Working Practices 2019
- Human Rights Act 1998
- [Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers May 2024](#)
- Keeping Children Safe in Education
- [Meeting digital and technology standards in schools and colleges](#)
- [Managing risk of radicalisation in your education setting](#)
- [Mental Health and Behaviour in Schools November 2018](#)
- [Prevent Duty guidance: England and Wales 2023](#)
- [Prevent duty self-assessment tool for schools - GOV.UK \(www.gov.uk\)](#)
- [Preventing and Tackling Bullying July 2017](#)
- [What to do if you are worried a child is being abused March 2015](#)
- [Public Sector Equality Duty Advice for Schools August 2022](#)
- [Searching, Screening and Confiscation: advice for schools July 2022](#)
- SEND Code of Practice:0-25 years 2015
- [Sharing of nudes and semi nudes: advice for people working in settings with children and young people March 2024](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)
- [Working together to Improve School Attendance August 2024](#)
- [Working together to Safeguard Children December 2023](#)

For the purposes of this policy the word 'child' or 'children' refers to any young person up to the age of 18. As BMS is located in Bedford Borough Local Authority, unless a child resides in a different authority, the School will follow procedures and protocols and follow advice for this area.

- 3.1 Governors and Leaders at Bedford Modern School are committed to ensuring the safety and wellbeing of young people is embedded in all of the organisation's processes and procedures, and consequentially enshrined in its ethos. Safeguarding is everybody's responsibility, and all staff have a responsibility to provide a safe environment where children can learn. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. The School expects **all staff** to share its commitment to create an open environment where staff and students feel able to raise concerns, where concerns will be listened to and where support services and other agencies are readily involved.
- 3.2 All professionals in school should make sure their approach is child centred and all staff must consider, at all times, what is in the best interests of the child.
- 3.3 When making decisions BMS staff will always respect and protect an individual's human rights in line with the Human Rights Act 1998.
- 3.4 Abuse in whatever form (including neglect and exploitation), always constitutes serious harm to the child. Suspicion, belief or evidence of abuse of a child, currently or in the past, must be passed to a person of authority in order for them to seek advice and evaluate the information. In most cases this will be to the Designated Safeguarding Lead, Jude Goodacre. The school supports Government advice: Think it, Report it.
- 3.5 It is accepted that child abuse can be a problem for children from all backgrounds and that any child may be in need of protection. All children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued, respected, feel confident and know how to approach adults if they have a concern. BMS

- will not discriminate against students because of any protected characteristic and will also seek to take positive action, if necessary, to deal with particular disadvantages affecting students with particular protected characteristics.
- 3.6 It is recognised that some children are additionally vulnerable because of the impact of their previous experiences, level of dependency, communication needs or other issues. In addition, some children have disproportionate vulnerabilities and may be more at risk of harm from specific issues. Where this is the case, these children may require additional pastoral care.
 - 3.7 The School accepts that child-on-child abuse can also occur and may be a sign that further problems are happening in a child's life.
 - 3.8 The School will ensure that all staff are aware of the policy and procedures around cases of child-on-child abuse and accept that even if no cases are reported this does not mean that it is not happening. Staff will remain vigilant for cases of child-on-child abuse and will recognise that 'abuse is abuse' and should never be passed off as 'banter' or 'part of growing up'.
 - 3.9 The School accepts that no single professional can have a full picture of a child's needs and circumstances. The School will work with other agencies as soon as possible (such as Children's Services and the Police) to support children who may benefit from early help (i.e. providing support either for a problem or to help stop a problem developing).
 - 3.10 The School will work closely with Local Safeguarding Partners and in particular follow the guidance set out by Bedford Borough and Central Bedfordshire with regards to training for designated staff. In the case of individuals, the School will always reference threshold guidance for the relevant local authority depending on where the child resides permanently. The School will use Bedford Borough Integrated Front Door and Early Help for advice and guidance as needed. The Designated Safeguarding Lead will attend local and HT forums.
 - 3.11 The School is committed to ensuring effective record keeping enabling the Designated Safeguarding Lead and Deputies to have access to a complete picture of any safeguarding concerns including making records of the decision around whether or not to refer a young person to Children's Services. Staff will make appropriate use of online Child Protection Systems. Information sharing will take into account GDPR but this will not be a limiting factor when deciding what information should be shared.
 - 3.12 The School (including the Governors and the Head) will maintain an 'it could happen here' attitude and will be actively encouraged to report any concerns regarding other staff, including the Head, via the appropriate channels (Whistleblowing).
 - 3.13 The School recognises the importance of safer working practices to keep all members of its community safe. All staff will be expected to read, sign and adhere to the School Staff Code of Conduct. In addition, teachers should adhere to the Teacher Standards 2012.
 - 3.14 The School is committed to ensuring that children are kept safe from those that may do harm through its recruitment process and proper maintenance of its single central record. Potential staff will be checked as to their suitability, including verification of identity, qualifications and satisfactory DBS check (according to guidance). All volunteers, visitors and contractors will be subject to the appropriate checks as well as close supervision as deemed necessary.
 - 3.15 The School recognises the importance of regular, detailed and informed training for all staff, a record of which will be maintained.
 - 3.16 The School accepts its duty to safeguard children and young people from violent extremism and takes positive steps to instil fundamental British Values. The School recognises that the possible radicalisation of children and young people is a current and real threat and treats such concerns as a safeguarding issue.
 - 3.17 The School understands that the context in which children live can influence their ability to stay safe and should always be taken into account when making

decisions about the best course of action when dealing with any safeguarding concerns.

- 3.18 The School recognises the impact of online technology on young people and is committed to safeguarding children through education for themselves as well as keeping parents/guardians as informed as possible.
- 3.19 The School recognises the importance of ensuring that filtering and monitoring systems are robust and fit for purpose and that all staff are aware of their roles and responsibilities.
- 3.20 The School promotes vigilance in all admissions and leavers procedures promoting a safeguarding response to any children who may go absent from or missing in education.
- 3.21 The School believes in creating a continuous learning environment and practice will constantly be reviewed and acted upon to ensure we always act in the best interests of the children.
- 3.22 The School will always seek to actively support parents/guardians through any safeguarding process and inform them of any action taken as quickly as possible. Where necessary this will be on the advice and with the support of external agencies.
- 3.23 The School recognises that mental health problems can be an indicator that a child has suffered or is suffering abuse or neglect and that mental health problems can also occur as a result of abuse or neglect. The School accepts that all staff have a responsibility to act immediately where a mental health concern is also a safeguarding concern.
- 3.24 The School recognises the importance of attendance
- 3.25 The School recognises its responsibility to promote young people's emotional health and well-being.

4. Aims

- 4.1. To demonstrate how the School will foster an active and positive safeguarding culture in all aspects of school life and throughout the entire school community.
- 4.2. To clarify the processes in place for Child Protection in the event of suspected abuse.
- 4.3. To ensure all staff are aware of and have access to the Key Contacts (including those responsible for Early Help) who will advise and guide in ensuring the best possible outcomes for all children and young people in the school.
- 4.4. To raise awareness of and provide guidance for the different types of abuse that occur as well as providing information and guidance on specific safeguarding issues
- 4.5. To set out the manner in which staff will be inducted and trained to enable them to carry out their safeguarding responsibilities.
- 4.6. To reinforce the importance of good communication, thorough record keeping and careful evidence taking to enable all professional agencies to act in the best interest of the child.
- 4.7. To highlight and reference the key statutory and guidance documents which will be used regularly by school staff to keep children safe at BMS.

5. Roles, Responsibilities and Key contacts.

5.1 The Governing Body

The Governing Body fully accepts their responsibility to comply with their duties under legislation and will ensure that the policies, procedures and training within the school are effective and comply with the law at all times. A full description of the responsibilities can also be found in the Harpur Trust Safeguarding Policy 2024. The nominated Safeguarding Governor is Mr Toni Munno. The Chair of Governors is Mrs Shirley Jackson.

The Governing Body will:

- Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to ensure policies and procedures are fit for purpose and support the delivery of a whole school approach to safeguarding.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty as necessary) and local safeguarding arrangements.
- Ensure they facilitate a whole-school approach to safeguarding.
- Recognise the importance of online safety, understand the expectations and responsibilities of their role in monitoring online safety including ensuring the school has monitoring and filtering systems which meet digital and technology standards and ensure it is embedded in a whole school approach to safeguarding
- Promote a positive safeguarding ethos with an attitude of 'it can happen here'.
- Through the Head and Leadership Team ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- Maintain an overview of the systems, structures and curriculum (including co-curriculum) of the school to ensure it actively promotes safeguarding and enables the best outcomes for all children.
- Follow the guidelines as laid out in KCSiE 2024.
- Have a nominated Child Protection and Safeguarding Governor.
- Review the policies and procedures for Child Protection and Safeguarding at least annually, or more frequently as required, through the Compliance Committee, Education Sub Committee and at a School Governing Body meeting.
- Take proactive steps to satisfy themselves that the duties outlined have been appropriately and efficiently discharged.
- Remedy any deficiencies or weaknesses in regard to Child Protection without delay.
- Ensure the School pays due regard to Government Guidance when dealing with safeguarding matters.
- Ensure that the school operates a thorough safer recruitment process, and that the Single Central Register is kept up to date and reviewed regularly.
- Ensure the School has a safeguarding response to children who go missing in education and/or who have regular unexplained or persistent absence
- Ensure that the School has a Staff Code of Conduct in place including a low level concerns policy.
- Through the Chair of Governors, receive and act upon any concerns about the Head via the whistleblowing process.
- Ensure the school is compliant with The Prevent Duty by maintaining an overview of how the school promotes Fundamental British Values.
- Ensure that the school complies with DFE Monitoring and Filtering Standards
- Ensure child protection files are maintained as set out in Annex C of KCSiE 2024.
- Ensure appropriate safer recruitment policies are in place, embedded and effective.
- Ensure, where reasonably possible, that the School holds more than one emergency contact number for each student.

This will be done by:

- Regular scrutiny at Committee meetings (School Governing Body and Education Sub Committee in particular) including a termly report and an annual report as well as an annual pastoral review.
- Regular meetings between the NSG and the DSL.
- Regular visits by the NSG and other Governors to review practice and meet with staff/students/key stakeholders.
- External audits where necessary.

5.2 The Head

The Head will:

- Promote a positive safeguarding culture with an attitude of 'it can happen here'.
- Ensure that the policies and procedures adopted by the Governing Body are fully implemented and followed by all staff.
- Ensure that sufficient resources and time are allocated to enable the Designated 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.
- Inform the Local Authority Designated Officer (LADO) in all cases of suspected or alleged abuse in relation to allegations against staff.
- Ensure the school meets the digital and technology standards.
- Ensure the school has due regard to all statutory and guidance documents as listed in this policy. .

5.3 The Designated Safeguarding Lead (DSL)

The role of the Designated Safeguarding Lead sits with the Deputy Head (Pastoral and Student Progress), Mrs Jude Goodacre, member of the School's Senior Leadership Team. The Deputy DSL will assume the responsibilities in the absence of the DSL and is the Senior Deputy Head, Mr Andrew Whomsley. The Deputy DSL in the Junior School is Mr Jonathan Bungard, Deputy Head Pastoral Junior School.

The DSL will:

- Take lead responsibility for Child Protection and Safeguarding in line with KCSiE 2024 paragraphs 102-105 and Annex C (including online safety and understanding the filtering and monitoring systems and processes in place).
- Refer cases of suspected abuse to the local authority children's social care as required and support staff who make referrals themselves.
- Recognise the importance of the Prevent Duty and refer cases to the Channel Programme where there is a radicalisation concern and support staff who make referrals themselves.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and refer cases where a crime may have been committed to the police.
- Promote an 'it could happen here' culture and encourage all staff to 'Think it, Report it'.
- Understand the process for providing early help as an intervention, for example locally agreed common and shared assessment processes such as Early Help assessments.
- Have a working knowledge of how Local Authority conduct a child protection case conference and be able to attend and contribute as required.
- Act as a point of contact with the three safeguarding partners.
- Liaise with the Head to inform him of any issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This

includes being aware of the requirement for children to have an Appropriate Adult

- As required liaise with the case manager and the designated officer at the local authority for child protection concerns in cases which concern a staff member.
- Act as a source of support, advice and expertise for all staff.
- Be available to discuss any safeguarding concerns during term time and out of school hours as deemed appropriate by the Head and Governing Body.
- Undergo formal training as provided and advised by the Local Safeguarding Partners at least every two years as well as taking active steps to keep up to date with new guidance, trends or safeguarding issues that are specific to the School.
- Liaise with other key members of school staff via the Safeguarding Committee to ensure that there is a thorough child-centred approach to individual children. This list includes the DSL, Deputy DSL, Mental Health Lead, School nurses and where appropriate the Attendance Officer, Director of Sport, Assistant Heads and Heads of Year.
- Liaise with outside agencies including following the protocols for the local area. Bedford Borough as well as from counties/areas in which the students reside, the Police and Schools Liaison officer and the Local Authority Designated Officer and the Channel Programme.
- Maintain written (hand or electronic) records of any concerns or decisions relating to Child Protection, including those that do not require immediate referral and ensure the records are kept confidentially and securely, separate from student records.
- Ensure that information is shared proactively and in a timely manner recognising that it is not always necessary to share a complete case file..
- Understand the importance of information sharing as well as understanding relevant legislation on data protection including the Data Protection Act 2018 and the General Data Protection Regulation.
- Transfer any student records to another school in a timely manner (within 5 working days) and in advance where to do so would promote better outcomes for those involved.
- Monitor attendance of all students and act in line with relevant statutory guidance '[Working together to improve school attendance August 2024](#)' in the first instance.
- Ensure process and procedures are in place to recognise and refer any children missing in education.
- Ensure all staff receive effective induction training on safeguarding when they join the School and then further updates as necessary with formal training at least every two years. Ensure that staff are aware of any training opportunities offered by the local safeguarding partners.
- Liaise regularly with the Safeguarding Governor, Dr Toni Munno, to ensure the Governing Body is kept up to date on any ongoing issues or concerns.
- Keep all staff well informed of any additional guidelines, updates, serious case reviews as and when necessary, through regular briefings.
- Understand the unique risks associated with online safety and, working closely with the e-Safety Co-ordinator, ensure that staff are aware of their responsibility with regard to online safety and ensure that all members of the school community have regular advice about keeping themselves safe online. Liaise with the e-Safety Co-ordinator and anti-bullying group as and when evidence suggests further review in both areas is necessary.
- Recognise the additional risks that children with SEND and disabilities face online.
- Recognise and raise awareness of the risks children face through both criminal and sexual exploitation referring children to the relevant external agencies where appropriate or necessary.

- Undergo and disseminate Prevent Training including acting as the Prevent Lead for the School. .
- Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced with teachers and school leadership staff. Ensure that staff know who these children are, and understand their academic progress and attainment, and maintain a culture of high aspirations for this cohort supporting teaching staff to identify the challenges that children in this group face and the additional academic support and adjustments that they could make to best support these children.

The Senior Leadership Team will:

- Ensure safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- Understand roles and responsibilities with regards to filtering and monitoring and meeting the digital and technology standards.

5.4 All Staff

Keeping Children Safe in Education states that **all** school staff have a responsibility to provide a safe environment in which children can learn. They should also:

- Have read and understood KCSiE, at least Part 1, or Annex A if appropriate.
- Participate in regular safeguarding training through newsletters, online or face-to-face including training on online safety.
- Understand their role and responsibilities for children's online safety including understanding the need for filtering and monitoring systems as well as being aware that children with unlimited access to the internet can engage in harmful online behaviour whilst at school.
- Promote a positive safeguarding culture, for example by challenging anyone on the premises who cannot be identified by a visitor, contractor or staff lanyard or badge.
- Leaders should also read and understand KCSiE 2024 Part 2.
- Be aware of systems within the school which support safeguarding. This includes the Safeguarding and Child Protection Policy, online safety policy, staff behaviour policies (Code of Conduct), Behaviour and Anti-bullying Policies.
- Understand the role of the DSL and be clear on the identity of the DSL and Deputies.
- Be aware of the Early Help process and be prepared to identify children who may benefit from early help.
- Be aware of the process for making referrals to social services understanding the importance of acting promptly if there is a concern about a child.
- Be aware of the signs of abuse neglect and exploitation, and of what to do if a child makes a disclosure.
- Understand the term 'child-on-child abuse' and the steps which should be taken to respond to incidents or disclosures.
- Always act in the best interests of the child.
- Be aware of specific safeguarding issues such as radicalisation, child sexual exploitation, children missing in education and mental health.
- Be aware of the child absent in education process
- **Teachers are required by law to report to the police known cases of female genital mutilation (FGM) involving a girl aged under 18.**
- Understand that appropriate internet filters and monitoring systems must be in place to keep students safe online.

- Be aware of their responsibilities regarding attendance at school
- All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.
- Know what to do if a child tells them he/she/they is/are being abused, neglected or exploited.
- If staff members have concerns about another staff member, then this should be referred to the Head or the Chair of Governors.
- If staff members have a concern about the Head, this should be referred to the Chair of Governors.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team.
- Be aware of the School's Low Level Concerns Policy.
- Promote fundamental British Values as part of The Prevent Duty.
- Be aware that abuse, neglect and Safeguarding issues are rarely standalone events.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as hurtful.

6. Definitions of Child Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others. This is particularly relevant in relation to the impact of domestic abuse, including when children see, hear or witness its effects.

6.1 Physical Abuse

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

- **Possible signs:**

Bruising (without satisfactory explanation), burns (often recurrent), bite marks, parent/guardians frequently alleging illness in a child, body covered in hot weather, reluctance to do PE or shower, self-harm.

- **Impact of physical abuse:**

It can lead to neurological damage, physical injuries, disability and occasionally death. Harm may be caused directly by the abuse itself or by the abuse taking place in a wider family context of conflict. Physical abuse has been linked to aggressive behaviour, emotional and behavioural problems and educational difficulties.

6.2 Neglect

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect

a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect's six forms:

1. Medical – withholding medical care including health and dental.
2. Emotional – lack of emotional warmth, touch and nurture.
3. Nutritional – lack of access to proper diet, which can affect their development.
4. Educational – poor school attendance prevents child from reaching their potential.
5. Physical – failure to meet child's physical needs.
6. Lack of supervision and guidance - putting child in dangerous situations.

Possible signs of neglect:

Constant hunger, poor personal hygiene, poor state of clothing, frequent lateness or non-attendance at school, untreated medical problems.

Impact of neglect:

Severe neglect of young children is associated with major impairment of growth and intellectual development. Persistent neglect can lead to serious impairment of health and development, and long-term difficulties with social functioning, relationships and educational progress.

6.3 Emotional Abuse

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Possible signs of emotional abuse:

Physical, mental and emotional development lags, over-reaction to mistakes, extremes of passivity or aggression, continual self-deprecation, self-harm, inappropriate emotional response to painful situations. It may be when an adult constantly behaves in an uncaring or hostile way towards a child or young person, perhaps by bullying, rejecting, frightening or criticising them.

Impact of emotional abuse:

Emotional abuse has an important impact on a developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy. Domestic violence, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse.

6.4 Sexual Abuse

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Possible signs of sexual abuse:

Genital pain or itching, bleeding, bruising, discharge, stomach pains, pregnancy, incontinence, UTIs or STDs.

Impact of sexual abuse:

Self-harm, inappropriate sexualised behaviour, depression, loss of or a poor self-esteem, aggressive behaviour, lack of trust, running away from home.

In making professional judgements, take into account:

The frequency of bruising/injury, context of injury, explanation from child and adult, parent response.

N.B. 'Non-Accidental Injuries' may need to be followed up too.

If injuries keep occurring, issues of neglect and level of supervision need to be discussed with appropriate agencies.

Table 1

Type of Abuse	Physical signs	Behavioural Signs
Physical: causing physical harm to a child, which includes fabricating or deliberately inducing illness.	Unexplained and unusual bruising, finger and strap marks, fractures, injuries, bite marks, cigarette burns, scalds, missing teeth	Fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others
Emotional: persistent emotional maltreatment such as to cause adverse effects on a child's emotional development.	Weight change, lack of growth or development, unexplained speech disorders, self-harm	Unable to communicate, fear of mistakes, fear of telling parents/guardians, withdrawn, few friends
Sexual: forcing or enticing a child to take part in sexual activities whether or not the child is aware of what is happening.	Genital pain or itching, bleeding, bruising, discharge, stomach pains, pregnancy, incontinence, UTIs or STDs	Fear of someone, nightmares, running away, sexually explicit knowledge or behaviour, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts

<p>Neglect: 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.</p>	<p>Hunger, dirty, ill-fitting clothes or inappropriate clothing, weight change, untreated conditions and continual minor infections</p>	<p>Being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent carer not attending</p>
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Table 1 identifies the four main types of abuse as set out in KCSiE 2024. The Table is designed to alert staff not only to the types of abuse, but also the different ways in which they manifest in individuals.

7. Specific Safeguarding issues

All staff will be made aware that there are specific safeguarding issues that can put children at risk of harm. This includes behaviours linked to drug taking, unexplainable or persistent absence from education, serious violence, radicalisation, sharing of nudes can all be signs that children can be at risk.

7.1 Children who may be particularly vulnerable

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

The School takes steps to protect children who may be particularly vulnerable through identification, close monitoring and mentoring and the use of a nurture list and through the use of an online system CPOMS. The School recognises that these children may be more likely to benefit from Early Help.

A child who may have an increased risk of abuse:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- 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. ;
- has experienced multiple suspensions, is at risk of being permanently excluded from school.
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- has a parent/carer in custody or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is at risk of honour-based abuse such as FGM or forced marriage;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;

- is a privately fostered child;
- Is persistently absent from education including persistent absences for part of the school day.

Children with SEND or certain medical conditions can face additional safeguarding challenges. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEND can be disproportionately impacted by things like bullying.
- Communication barriers and difficulties overcoming these barriers.

Staff are trained to be alert to these concerns and act where necessary, and additional pastoral support is available for these students. All staff have guidance from the SENDCo and there is a comprehensive list of students who have SEND available to all teachers.

Children who are lesbian, gay, bi-sexual or gender questioning

Children who are LGBT can be targeted by other children, this includes children who are perceived to be LGBT who may also be vulnerable to being targeted. Risks are compounded where children lack a trusted adult they can talk to. Staff will endeavour to reduce the additional barriers faced and provide a safe space for LGBT children to speak out/share their concerns.

The School takes into account the CASS review and always applies caution when supporting any child questioning their gender. We recognise there are many unknown factors which could contribute to this including complex mental health and psychosocial needs or diagnosis of ASD and/or ADHD. In line with guidance the School will signpost families/carers to clinical help and advice. This is especially the case for pre-pubertal children. The School will consider each case from an individual perspective taking account of their needs and working closely with parents/guardians unless to do so would constitute a significant risk of harm to the child. The School will refer to the relevant guidance when deciding how to proceed.

7.2 Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents/guardians have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

7.3 Child on Child Abuse

We recognise that 'abuse is abuse' and should never be passed off as 'banter' or 'part of growing up.' Bullying, victimisation, harassment and discrimination will not be tolerated. We treat all our students and their parents/guardians fairly and with consideration and we expect them to reciprocate towards each other, the staff and the wider community. All staff are expected to challenge abusive behaviour between peers, and this is included in induction training. Staff are reminded that even if there

are no reports of child-on-child abuse it may still be taking place and they should be alert to any possible cases. Staff are also made aware that it is more likely that girls will be victims and boys will be perpetrators but that all child-on-child abuse is unacceptable and will be taken seriously.

To minimise the risk of child-on-child abuse at BMS we work hard to promote and teach tolerance and mutual respect through our PHSE Programme and RSE (Relationships and Sex Education) curriculum, anti-bullying strategy and our promotion of Fundamental British Values. The School's Aims and Values are shared on a regular basis through assemblies, co-curricular activities and our house and student leadership systems as well as visual reminders around the school. We also commissioned an external audit to review our practice and are implementing actions directly related to the feedback. These include regular communication with key groups such as the Fawcett Society, a review of our CPOMS reporting systems, a review of places which are high risk for child-on-child abuse and a review of reporting mechanisms.

Students can report abuse through their form tutor or class teacher, Head of Year or through another trusted member of staff such as the School Nurses or the Wellbeing Team. They can use email, the anonymous online reporting tool, or they can drop an anonymous note into the box in the wellbeing room. Sixth Form monitors are trained in safeguarding and support in Common Rooms during break and lunchtime. Students are also educated in how to report abuse through national organisations such as thinkuknow, NSPCC or Childline.

However, we recognise that students are capable of abusing their peers. This abuse may take the form of:

- bullying (including cyberbullying, prejudiced based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party;
- upskirting, which 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;
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals. (This could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child-on-child abuse will always be considered a safeguarding matter and staff will follow the guidance on specific issues as laid out in this policy and in the anti-bullying strategy. In all responses the school will endeavour to put the students' welfare at the centre of its response. All incidents of child-on-child abuse will be recorded on CPOMS and will be actioned by the Pastoral Team under the guidance of either the Deputy Head (Pastoral and Student Progress), DSL, Deputy Head Pastoral (Junior School), DSL or Deputy Head Academic (Junior School), Deputy DSL. When dealing

with incidents the senior member of staff will decide which school policies (e.g. Senior School Behaviour Policy) and/or government guidance (e.g. Sexual Harassment and Sexual Violence in Schools) apply. If there is a possibility that a crime may have been committed the School will take advice from the police or Bedford Borough Integrated Front Door on the investigation of such allegations and will take all the appropriate action to ensure the safety and welfare of all students involved including the student or students accused of abuse.

Where allegations of abuse or assault have been made against one or more student, the School will undertake a thorough risk-assessment of the situation and risk-based decision-making will be carried out with a view to ensuring the safety of all students involved. Both the victim and perpetrator will be provided with appropriate support. When child-on-child abuse has occurred, it may be appropriate to refer the students involved to Children's Social Care or Early Help. Where this happens, the school will inform the student involved and their parents/guardians unless to do so is likely to cause the student harm.

A student (or students) against whom an allegation of abuse has been made may be suspended from the School during the investigation. A student may also be removed from certain classes or sleeping arrangements rearranged if the alleged incident occurs on a school trip.

If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Local Safeguarding Partners, the student's parents/guardians are informed as soon as possible, and that the student is supported during the interview by an appropriate adult.

Data on child-on-child abuse will be reviewed regularly by the Safeguarding Team, Senior Leaders and Governors to spot any trends and take any necessary action to address issues and concerns.

7.4 Abuse and Technology

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and exploitation online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online. This can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. All staff are aware that children may have unlimited access to the internet unfiltered through mobile technology whilst on school premises. The School has specific Policies, which cover these specific issues in more detail. Please also see the section on [Online Safety](#).

Cyber-bullying is covered in more detail in the Anti-Bullying section of the Behaviour Policy. Following the advice in Preventing and Tackling Bullying, the School will take disciplinary action where cyber bullying occurs. It will be treated as child-on-child abuse.

7.5 Honour-based Abuse/Violence

Honour-based violence is a collection of practices used to control behaviour within families in order to protect perceived cultural and religious beliefs and/or honour. Violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Women are predominantly (but not exclusively) the victims, which can be distinguished from other forms of violence, as it is often committed with some degree of approval and/or collusion from family and/or community members. Males can also be victims, sometimes as a consequence of their involvement in what is deemed to be an inappropriate relationship, if they

are gay, or if they are believed to be supporting the victim. Honour-based abuse cuts across all cultures, nationalities, faith groups and communities, usually where a culture is heavily male dominated. Relatives, including females, may conspire, aid, abet or participate in honour-based abuse, for what might seem a trivial transgression.

Female Genital Mutilation (FGM): 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. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. For more information

Teachers are required by law to report to the police known cases of female genital mutilation (FGM) involving a girl aged under 18

Forced Marriage should not be confused with an arranged marriage. Arranged marriages often work very well. Forced marriages are where one or both people are 'forced' into a marriage that their families want, without the valid consent of both people, where physical pressure or emotional abuse is used. Victims are sometimes persuaded to return to their country of origin under false pretences.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th Birthday.

Breast Ironing, also known as 'Breast Flattening', is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education.

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

CSE and CCE occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual activity, cognitive ability, physical strength, status and access to economic or other resources. This abuse can be perpetrated by individuals or groups, males or females and children or adults. It may be a one off or a series of incidents over time from opportunistic to complex organised abuse. The victim may have been exploited even if the activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

CSE and CCE can affect young people from any social, cultural or economic background. Warning signs include non age-appropriate relationships, gifts including drugs, alcohol and money or use of inappropriate sexual terminology.

7.7 Serious Violent Crime

Indicators that may signal a child is at risk of serious violent crime include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing or signs of an assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached or are involved with individuals associated with criminal networks or gangs.

7.8 County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines. Children can be targeted in school or recruited online using social media.

7.9 Cybercrime

Cybercrime is a criminal activity committed using computers and/or the internet. All staff are aware that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

7.10 Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents/guardians or other family members as well as people known but not related to the victim and by strangers.

Community safety incidents in the vicinity of a school can raise concerns amongst children and parents/guardians, for example people loitering nearby.

Time and care is taken to ensure that all students are provided with safety advice on a regular basis especially as they get older and are granted more independence.

7.11 Children and the Court System

Children are sometimes required to give evidence in criminal courts either for crimes committed against them or for crimes they have witnessed. Guidance is available to support children, and external agencies will also provide support which the School will ensure students and families have access to.

Making child arrangements through family courts following separation can be stressful and entrench conflict in families. Sometimes the School is asked to engage with CAFCAS and supports children going through or after this process.

7.12 Homelessness

Being homeless or at risk of becoming homeless presents a real risk to a child's welfare. The DSL and Deputies are aware of how to refer through to the local Housing Authority to support as needed. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Homelessness can also occur for 16- and 17-year-olds who are living independently from their parents/guardians. Children's social care will be the lead agency for these children and the DSL will ensure appropriate referrals are made based on the child's circumstances.

7.13 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. Staff observe children and identify and record any whose behaviour suggest they may be experiencing mental health problems or are at risk of developing one. Where staff have specific concerns about a child's mental health and consider it a safeguarding concern it is referred to the DSL in line with this policy.

The DSL and Deputies work closely with external agencies including CAMHS to refer any child who is displaying mental health problems. The School uses an evidence-based approach recording evidence and observations to share and does not attempt to make diagnosis. However, staff will escalate and re-refer if they feel there is need.

The School works to ensure it follows the advice and guidance in Preventing and Tackling Bullying and Mental Health and Behaviour in Schools. In September 2021, a Mental Health Lead will be in post to lead the whole school approach to mental health in line with the Government Green Paper.

Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the School will work with other key professionals to coordinate a meeting with parents/guardians where possible. Ideally, this would be before a final decision has been made, to ensure the parents/guardians have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Alternative Provision

The cohort of students in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their students may be vulnerable to. Where students are placed in alternative provision, the School will ensure that relevant safeguarding policies and practice are in place.

7.14 Domestic Abuse

The Domestic Abuse Act 2021 defines Domestic Abuse as any of the following behaviours, either as a pattern of behaviour or as a single incident between two people over the age of 16 who are personally connected to each other.

- a) Physical or sexual abuse;
- b) Violent or threatening behaviour;
- c) Controlling or coercive behaviour;
- d) Economic abuse (adverse effect of victim to acquire, use or maintain money or other property or obtain goods or services; and
- e) Psychological, emotional or other abuse

People are 'personally connected' when they are, or have been married to each other or civil partners, or have agreed to be married or become civil partners. If the two people have an intimate relationship with each other, have shared responsibility for the same child, or they are relatives.

The definition of domestic abuse applies to children if they see, hear or experience the effects of the abuse and they are related to the abusive person. This can have a

detrimental and long-term impact on their health, wellbeing, development and ability to learn.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse regardless of sexual identity, age, ethnicity, socio economic background and domestic abuse can take place both inside and outside the home.

The National Abuse helpline can be called free of charge and in confidence 24 hours a day on 0808 2000 247

7.15 Children Absent from Education

BMS recognises that Children being absent from education for prolonged periods and/or on repeat occasions can act as a warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation. BMS takes action when children are persistently absent from school or have unexplainable absences following the guidance in '[Working Together to improve school attendance August 2024](#)'. Further details can be found in the BMS Attendance Policy.

Children Missing Education

A child missing from education is a child of compulsory school age who is not on a school roll or being educated elsewhere. A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

Children Missing from Education (including safeguarding response)

BMS fully accepts its responsibilities to provide a safeguarding response to Children Missing from Education and understands as a school it plays a key role in ensuring children do not become CME.

A child missing from education is not in itself a child protection matter, and there may be an innocent explanation for this. However, regular school attendance is an important safeguard and unexplained non-attendance can be an early indicator of problems, risk and vulnerability.

Schools should endeavour to deal with this problem in three ways:

- By preventing poor school attendance and truancy.
- By acting once absence occurred to establish children's safety and try to get them back to school.
- By taking action to trace children whose whereabouts are not known.

BMS will inform both **Bedford Borough and the relevant Local Authority** (i.e. the one in which the child resides) when a child's name is about to be deleted from the admission register under all fifteen grounds outside the standard transition points (Junior School Year 6 into 7 and Senior School Year 11 into 12).

When removing a name, the notification to the Local Authority will include (a) the full name of the student, (b) the full name and address of any parent with whom the student normally resides, (c) at least one telephone number of the parent, (d) the student's future address and destination school and (e) the ground in regulation 8 under which the student's name is to be removed from the admission register.

The school will **make reasonable enquiries** to establish the whereabouts of the child jointly with Local Authority before deleting the student's name from the register if the deletion is under regulation 8 (1), sub paragraphs (f) (iii) and (h) (iii).

BMS will notify the Local Authority **within five days** of adding a student's name to the admission register at a **non-standard** transition point.

As an independent school, BMS does not use CTF files. However, where these files are sent by a students' previous school, BMS will either accept or reject the file.

A child may be removed from the school following a written request from parents/guardians to educate at home. In the event of this happening, the relevant Local Authority and Early Help service will be informed.

If any member of the school staff has reason to believe a child is missing from or about to be missing from education, they must inform the DSL. The DSL will then inform the Local Authority, Early Help, or in the case of a Child in Need or a Child in Need of Protection, MASH or the police.

In the following circumstances, a referral to Children's Services and /or the police should always be made promptly:

- The child may be the victim of a crime.
- The child is subject of a Child Protection Plan.
- The child is subject of Section 47 enquiries.
- The child is looked after.
- There is a known person posing a risk to children in the household or in contact with the household.
- There is a history of the family moving frequently.
- There are serious issues of attendance.

All Practitioners should follow the appropriate Local Authority CME procedures.

6.16 Private Fostering

Private Fostering occurs when someone other than a parent or a close relative care for a child (under the age of 16 or under the age of 18 if the child is disabled) for a period of 28 days or more, with the agreement of the child's parents/guardians. By law, children's services must be informed in such cases.

6.17 Prevent Duty

Schools are required under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism, i.e. becoming terrorists or supporting terrorism

At BMS we recognise that any child could be susceptible to being drawn into terrorism because there is no single pathway to being radicalised. We also recognise that a child's susceptibility can be linked to their vulnerability and could be linked to age, disability, risk of abuse or neglect. However we accept that not all children who are susceptible will be radicalised. In addition to violent extremism we are also aware of and alert to non-violent extremism including certain divisive or intolerant narratives which can be reasonably linked to terrorism.

Note is taken that the biggest threats to the UK are currently considered to be from Islamist terrorism which is considered to be resilient and enduring as well as Extreme

Right Wing Ideology which is resurgent. Threats are not limited to these ideologies and may also come from established terrorist ideologies such as antisemitism, misogyny, anti LGBT grievances or ethnic superiority however these currently represent a significant smaller threat than Islamist terrorism or Extreme Right Wing Ideology.

At BMS we protect children from radicalisation by building their resilience, promoting Fundamental British Values and provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. We accept that Prevent is part of our wider safeguarding duty and welfare responsibilities.

Designated Lead for Prevent

The DSL will act as the Designated Lead for Prevent and will ensure they are up to date with any relevant information having received more in depth training in line with Bedford Borough safeguarding Procedures

Training and Induction

All staff will receive appropriate training on Prevent at Induction and through regular updates as and when is required. Training will include understanding the factors that lead people to support terrorist ideologies or engage in terrorist related activity. Staff will be able to recognise susceptibility to terrorism and be aware of what action to take in response.

Certain staff will receive additional training which is relevant to their role such as pastoral staff or those who are responsible for overseeing the management of external speakers and events.

What Staff need to know

Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

Staff should be particularly aware of the dangers of social media and the internet in the radicalisation of young people.

Any child suspected of becoming radicalised should be reported via relevant local authority safeguarding board of where the child resides (see [Key Contacts](#)).

All staff should also be aware that radicalisation can occur both off and online. Children, young people and adult learners are at risk of accessing inappropriate and harmful extremist content online. This could include downloading or sharing terrorist material, which could be a criminal act.

The internet and social media make spreading divisive and hateful narratives to millions of people easy. Extremist and terrorist groups and organisations use social media (for example, apps, forums, blogs, chat rooms) to identify and target vulnerable individuals.

You do not need to be an online expert to understand when a child, young person or adult learner is at risk of harm. You should deal with harmful online behaviour in the same way as offline activity.

Some children are more vulnerable to radicalisation.

Push factors

Push factors may include a child, young person or adult learner feeling:

- isolated
- they do not belong
- they have no purpose
- low self-esteem
- their aspirations are unmet
- anger or frustration
- a sense of injustice
- confused about life or the world
- real or perceived personal grievances

Pull factors

Pull factors could include an extremist or terrorist group, organisation or individual:

- offering a sense of community and a support network
- promising fulfilment or excitement
- making the child, young person or adult learner feel special and part of a wider mission
- offering a very narrow, manipulated version of an identity that often supports stereotypical gender norms
- offering inaccurate answers or falsehoods to grievances
- encouraging conspiracy theories
- promoting an 'us vs. them' mentality
- blaming specific communities for grievances
- encouraging the use of hatred and violent actions to get justice
- encouraging ideas of supremacy

Please remember radicalisation is like grooming. Whether this happens online or offline, you should treat it in the same way.

Making a referral

If a member of staff is worried that a person is at risk of extremist behaviour or radicalisation, they should:

- Observe the concern, listen to a disclosure, observe any changes in behaviour
- Record the concern as per the BMS safeguarding procedure (reporting this on CPOMS)
- Talk with the Designated Safeguarding Lead (DSL) as a priority
- If appropriate, speak with the child/person to get a better understanding of what they are saying
- If appropriate check with parent/carer unless it could put the child/person at further risk of harm

If the child / person is at immediate risk of harm, the member of staff should report this to the police using 999.

The DSL will:

- Review the case in line with the guidance '[Managing the risk of radicalisation in your education setting](#)' ;
- Consider any other relevant safeguarding information and follow the local authority procedure, e.g. The Luton and Bedfordshire Prevent in Education Referral Process ([Appendix F](#)) or
- make a referral using the National Referral Form.

Promoting Fundamental British Values:

The Leaders and Governors of Bedford Modern School ensure that Fundamental British values are promoted throughout the school both implicitly and explicitly for example through the School Values, the structure of the Student Government or during the Remembrance Day Service. Where the school has a programme of individual speakers (for example in the Sixth Form), care is taken to ensure there is a balanced view, especially on controversial topics, and each speaker will be risk assessed and in line with the protocol for visiting speakers (Appendix C).

The School recognises that the internet is now considered the preferred avenue for radicalisation, particularly with regards to children. BMS ensures that preventative measures are in place such as ensuring appropriate restrictions on internet sites are in place and in line with DFE Filtering and Monitoring Standards.

6.18 Sexual Violence and Sexual Harassment

Any allegations of sexual violence or harassment will be treated seriously, and any victim will be supported and kept safe. All staff will be aware that any such allegation should be treated as a safeguarding concern for all involved and the DSL should be informed immediately.

When dealing with such allegations, the statutory guidance in KCSiE 2024 part 5 will be followed. Where necessary a risk assessment will be put in place to protect those involved.

Support from the police, 'What If' at MASH or from Social Services may be sought or the School may decide it is most appropriate to handle the decision internally. In this case it will be a discussion between the DSL, Head and Senior Deputy Head. Decisions and discussions will be recorded at all times using CPOMS. Whatever the decision, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

[Preventing Child Sexual Abuse & Keeping Children Safe | NSPCC](#)

Call us on 0808 800 5000, email help@nspcc.org.uk or fill in our online form.

6.19 Sharing nudes and semi nudes

The term 'sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. It also includes images created by the use of Artificial Intelligence. For more information click on link below:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\)](#)

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image-sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer;
- children and young people digitally manipulate an image of a young person into an existing nude online;
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

Further guidance on the motivations for taking and sharing images and videos can be found in ['Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#).

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. There are also a range of risks which need careful management from those working in education settings.

Disclosures should follow the normal safeguarding practices and protocols and the guidance set out in the online safety policy. Where sharing of nudes or semi nudes is suspected or possible the School will always follow the procedures laid out in UK Council for Child Internet Safety and Government guidance as below. Staff who become aware of youth-produced sexual imagery should be also aware of [Searching, Screening and Confiscation Advice](#) (July 2022). The key consideration is for staff not to view or forward illegal images of a child. ['Sharing nudes and semi-nudes: advice for education settings working with children and young people'](#)

6.20 Upskirting

The taking of a picture under another's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear.) It is now a criminal offence.

8. Training and Induction

Governors and School Leaders will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. The DSL, working with the Senior Deputy Head and the Deputy Head Pastoral (Junior School) with the support of the Senior Leadership Team, takes responsibility for ensuring that all staff have training to recognise the signs of abuse and neglect and know what to do if they have a concern about a student or a member of staff.

Induction:

All new staff are required to read KCSiE 2024 Part 1 and Annex B, the Safeguarding and Child Protection Policy, the Staff Code of Conduct and the either the Junior or Senior School Behaviour Policy (which contains relevant information on anti-bullying and the types of bullying which teachers should be aware of) prior to starting employment. A small number of staff in agreement with the Head, Senior Deputy Head and the Director of Operations will read Annex A only. All new staff will receive bespoke Safeguarding Training by the DSL. New teaching staff are also assigned a mentor who acts as a support for any questions or concerns and makes sure the school's protocols and systems are understood.

Induction Training includes:

- Definition of safeguarding.
- Role and identity of DSL and Deputies.
- Importance of early identification and Early Help.
- Four main categories of abuse.
- What to do if a child is at risk of serious harm including how to make a referral to Children's Social Care.
- Know what to do if a child makes a disclosure.
- How to react to child-on-child abuse including accepting that it does happen here but understanding that children can find it hard to report.
- Awareness of online safety including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Understanding of the Code of Conduct including low levels concerns policy.
- Specific safeguarding issues including Children Missing in Education Response.
- Whistleblowing.
- What to do if you are concerned about a member of staff (including supply staff).

Training

Training for the DSL

The DSL is trained in line with Bedford Borough guidelines and is expected to have attended the working together course followed by biannual refresher training which may be an update from the local authority or other relevant training to enhance a particular area of safeguarding.

Training for the DDSL's

All DDSL's are trained to the same level as the DSL and attend the working together course with Bedford Borough followed by biannual training either updates for the DSL or other relevant training to enhance a particular area of Safeguarding.

Training for the DSL and DDSL's is recorded and monitored, not only to ensure that the School is compliant with Bedford Borough expectations but also to enable a breadth of expertise across the team.

- All teaching staff and support staff who have contact with the students, receive regular training every year about their responsibilities with regards to Safeguarding and Child Protection. All staff will be updated on a more regular basis (at least once per year) as and when new information/changes come to light.
- An INSET course for all staff on Safeguarding takes place at least annually and often termly. In addition, all staff receive an updated copy of the safeguarding training handbook each year, which clearly sets out the school's policy and procedures. Clear records are kept which are constantly updated and any staff

who were unable to attend training will attend an additional session or complete an online course.

- Safeguarding bulletins are sent out every term and an 'e-safety' briefing is also sent out to staff and parents/guardians at least twice a year.
- All staff received a copy of Part 1 KCSiE September 2024 at the beginning of the Autumn term 2024 which staff read and confirmed that they understood. All staff who work directly with children also receive a copy of KCSiE Annex B. All staff received a copy of the Code of Conduct.
- In addition, Leaders and Managers will ensure that all staff are trained in any relevant safeguarding process and procedures relating to their role within the school.

In addition to the DSL and the Senior Deputy Head, the Junior School Head, Junior School Deputy Head, Mental Health Lead, Heads of Year and CCF Contingent Commander/Outdoor Education Co-Ordinator, have also attended the two-day safeguarding inter-agency training from the Local Safeguarding Partners LCSB (Central Beds/Luton/Beds Borough).

Staff will also receive appropriate training to enable them to teach Safeguarding to children through everyday tutoring, PSHE and RSE Education.

The School is committed to being reflective and reviews any serious cases both internally and within the Harpur Trust to ensure lessons are learned and best practice is in place.

9. Whistleblowing

The School promotes an environment in which children and adults feel confident to express concerns regarding the behaviour of a member of staff.

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear or repercussion.

Staff should acknowledge their individual responsibilities to bring matters of concern to the attention of the Senior Leadership Team and/or relevant external agencies. This is particularly important where the welfare of children may be at risk.

These procedures should be read in conjunction with the Harpur Trust Whistleblowing policy.

If a member of staff feels unable to follow the school protocols on whistle blowing, they may contact the NSPCC whistleblowing helpline on 0800 028 0285 or email help@nspcc.org.uk

10. Procedures for acting when abuse by a member of staff (including supply staff, contractors and volunteers) is alleged

In the event of an allegation, the school will follow the guidance below, referring closely to the duties as an employer and employee as laid out in part four of KCSiE 2024.

This process should be followed if an allegation is made that might suggest a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. If there is an allegation that a person 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 or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This relates to members of staff, supply staff and volunteers who are currently working at the School regardless of whether this is where the abuse took place. Allegations against teachers who are no longer teaching will be referred to the police, as will historical allegations.

The School recognises its duty of care towards employees and will provide support and a named contact for anyone who is suspended. If the School is not the employer, responsibility is still recognised. At any stage of consideration or investigation, all unnecessary delays should be eradicated, and the allegations will be dealt with quickly to provide effective protection for the child and to support the person who is the subject of the allegation.

Common sense and judgement will be applied when dealing with allegations. The School will not undertake their own investigations of allegations without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases discussions with the LADO can be held informally and without naming the school or individual.

All allegations are to be reported straight away to the Head (Case Manager). In his absence it would be reported to the Chair of Governors who would ensure that the LADO is informed without delay. If the Head is the subject of an allegation this should be reported to the Chair of Governors without informing the Head or DSL first. The Chair of Governors will inform the LADO without delay within 24 hours and any action taken should be by the Chair or other members of the Governing Body.

If a student makes an allegation against the DSL with responsibility for Child Protection, the member of staff receiving the allegation must immediately inform the Head who will inform the Chair of Governors or the Governor with specific responsibility for Child Protection, currently Dr Toni Munno. They will ensure the LADO is informed without delay.

The case manager will discuss the case with the LADO to consider the nature, content and context of the allegation and agree a course of action. There may be situations where the case manager will want to involve the police immediately or they may discuss this with the LADO.

The initial discussion may lead to a decision that no further action is to be taken. In this case the decision and a justification will be recorded by both the case manager and the LADO with an agreement reached on who should record what.

The case manager will inform the accused person as soon as possible following the consultation with the LADO making sure they have as much information as possible. If a strategy meeting is needed and/or if police and children's social services need to be involved, the case manager will not do that until those agencies have been consulted and agreed what information can be disclosed to the accused.

Careful consideration will be given to whether the circumstances warrant the accused being suspended from contact with children at the School or whether alternative

arrangements can be put in place until a resolution has been reached. All options to avoid suspension will be considered.

When it is clear that investigation by the police or children's social services is unnecessary, the LADO and the case manager will agree the next steps. This will depend on the nature and circumstances of the allegation and the evidence and information available and will range from no further action to dismissal or a decision not to use the person's services in the future.

If further enquiries are needed an investigation will normally be undertaken by a senior member of the school staff.

The School recognises the duty of care towards those involved and will ensure that the procedures for support and confidentiality as laid out in KCSiE 2024 part four (page 60 and 61) are followed.

If the accused person resigns this will not prevent an allegation being followed up.

The investigation and subsequent decisions, actions and recording of information will be conducted in line with other relevant policies and following the guidance as laid out in KCSiE 2024 part four.

If the school (as the employer) thinks an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child, a referral to the DBS will be made in line with statutory responsibility.

Where qualified teachers are registered, any misconduct referrals (that is those which are not child protection-related) must be reported to the Teaching Regulation Agency.

If a child is involved information must be recorded on a yellow (Cause for Concern) form or as a CPOMs incident under the category of Child Protection. Where necessary referrals will be made to Children's Social Care or Early Help; this may be done by the LADO. This may happen whether or not an allegation is substantiated. If the allegation is shown to be deliberately malicious, the Head will consider whether any disciplinary action is necessary against the student who made it or whether the police should be asked to consider if action might be appropriate against the person responsible.

The school will always apply a 'lessons learnt' rule and aim to make any relevant changes to policy and practice as deemed necessary.

Allegations found to be malicious are removed from personnel records. Records are kept of all other allegations but those not substantiated, unfounded or malicious are not referred to in employer references.

Note: any member of staff may make a referral to external agencies.

10.1 Low-level Concerns (Concerns that do not meet the harm threshold)

All low-level concerns should be reported to Jude Goodacre, DSL, or Jonathan Bungard DDSL for the Junior School.

As part of our whole school approach to safeguarding, the School creates a culture in which all concerns about adults (including allegations that do not meet the harms threshold outlined in KCSiE 2024) are shared responsibly and with the right person, recorded and dealt with appropriately. In addition, The School aims to create an

open and transparent culture; enabling the School to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the organisation are clear about professional boundaries and act within them, in accordance with the ethos and values of the school.

What is a low-level concern?

The term 'low-level' does not mean that it is insignificant. While a low-level concern does not meet the thresholds outlined in KCSiE 2024 paragraph 338, it could be any concern, no matter how small, and even if no more than causing a sense of unease or 'nagging doubt' – that an adult working in or on behalf of the School may have acted in a way that:

- Is inconsistent with the staff Code of Conduct. This can include concerns that occur outside of the workplace.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their personal mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating, or offensive behaviour.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Staff do not need to be able to determine in each case whether their concern is a low-level concern (that does not meet the harm threshold), or if it is serious enough to meet the harm threshold (that should be referred to the LADO). Once staff share what they believe to be a low-level concern, the determination as to the level of the concern should be made by the Head

Sharing low-level concerns

All low-level concerns should be shared with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead in the Junior School who will subsequently report to the Head. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is lost." .

Where a concern is raised about the Head, this should be reported to the Chair of Governors or it may be reported directly to the LADO.

It is important that any low-level concern is shared with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead in the Junior School as soon as reasonably possible and, in any event, ideally within 24 hours of becoming aware of it (where the concern relates to a particular incident). However, it should also be emphasised that it is never too late to share a low-level concern.

The School will ensure that the safeguarding environment encourages staff to feel confident to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they

believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern relates to a person employed by an agency or contractor, the same procedure will be followed, and their employer notified about the concern.

Staff sharing concerns are encouraged to share their identity as this will help to create a culture of openness and transparency. If, however, the staff member who raises the concern does not wish to be named, then the organisation should respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity will never be promised to members of staff who share low-level concerns.

Anyone making a Low Level Concern is required to keep the details confidential.

Responding to low-level concerns

Any low-level concerns will be investigated by the DSL or Deputy DSL who will collect as much evidence as possible by speaking to the person who raised the concern, to the individual involved and any witnesses. The investigation will help categorise the type of behaviour and determine what further action may be taken.

In some cases when a concern does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO – it may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary."

Recording low-level concerns

All low-level concerns should be recorded in writing on the 'low-level concerns log'. The record should include details of the concern, the context in which the concern arose, and any action taken. The name of the individual sharing their concerns should be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The DSL and Deputy DSL will have responsibility for recording information on the log and the Assistant to the Deputy Head will provide administrative support as necessary.

The recording of data will be necessary and proportionate for the purposes listed below and to promote the safeguarding of all children in line with guidance (ref IIICSA 2022).

- The log will be reviewed termly and will be kept confidential, held securely and comply with the Data Protection Act 2018, at least until the individual leaves employment. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter will be referred to the LADO.

The records' review might identify that there are wider cultural issues within the School that enabled the behaviour to occur. This might mean that policies or processes will be revised, or extra training delivered to minimise the risk of it happening again.

- KCSIE prohibits schools and colleges in England from referring to unsubstantiated, malicious or false allegations in references. Only safeguarding allegations that have been substantiated should be included in references:
 - where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference
 - low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

11. Promoting Safeguarding and Prevention

It is the aim of Bedford Modern School to create a warm and supportive environment where students feel safe and secure. We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult provide an essential framework within which our students can live increasingly independent lives. BMS has a set of values and an Expectations Charter all members of the school community are expected to demonstrate through all aspects of school/college life. This is underpinned by our pastoral care and behaviour policy. Sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment are not tolerated.

Students are actively encouraged to talk, and they are listened to sympathetically. Their viewpoint is valued, and their opinions regularly sought.

Teaching and support staff provide guidance through the pastoral system or as subject staff. All are aware of the need to safeguard children and of their responsibilities in identifying and reporting concerns regarding students' well-being, including possible cases of abuse. Assemblies are held regularly which promote safeguarding, mental health and online safety and additional assemblies are held, when necessary, in response to any concerns. Sixth Form Monitors and Year 13 students receive full safeguarding training from the DSL to enable them to support both staff and younger children.

Through the Personal, Social, Health and Economic Education (PSHE) programme, responsible attitudes to adult life and parenthood are engendered and students' awareness is raised. This also includes covering relevant issues through Relationship Education in the Junior School, and Relationships and Sex Education in the Senior School.

Students are taught online safety through a variety of methods including system monitoring which allows staff to facilitate educational conversations as necessary. Students are made aware of a variety of support mechanisms in place to help them keep safe. ([See paragraph 15 for more information.](#))

The School has both a vertical and horizontal pastoral structure to support children develop and thrive. Heads of Year, assisted by Assistant Heads of Year, manage teams of tutors who are responsible for the day-to-day pastoral care of the students. In the Sixth form tutor groups are divided into clusters which are overseen by Senior Tutors and ultimately the Director of Sixth Form. The House system is run by the senior students, overseen by Heads of House and the Senior Head of House. Its vertical ethos encourages younger students to mix with older students in a safe and supportive environment.

Peer-to-peer support is at the heart of the School's success. Each year group has a team of monitors, led by the Senior Monitors and Head Boy and Girl and their Deputies. The monitors are on duty at break and lunchtime and work to promote social interaction and communication within the year group. They also act as role models and mentors to the younger students.

We believe that Bedford Modern School promotes the welfare, health and safety and guidance of every student through its positive, safe and stimulating environment.

11.1 Multi Agency Working

The school is committed to working with external agencies including but not limited to the three local safeguarding partners (primarily those in Bedfordshire but also where necessary surrounding counties), CAMHS, CHUMS, and various local charities such as Mind Map and Aquarius. The school will be proactive in seeking help and advice at the earliest possible point. The School will also promote the sharing of information between agencies in order to act in the best interests of the child and will encourage TAF meetings which bring together all of the agencies as well as the parents/guardians and where necessary the child. The School recognises the importance of the voice of the child and will seek to gain and include this at each step.

11.2 Early Help

All staff are trained to be alert to the signs of abuse and encouraged to record any concerns. All staff are aware that certain children ([see paragraph 6.1](#)) are more vulnerable and likely to benefit from Early Help. Staff at BMS are encouraged to record any information (however insignificant it may seem) that may be relevant using the electronic system CPOMS.

Bedford Modern School is completely committed to Early Help as defined in Working Together to Safeguard Children December 2023):

Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Providing Early Help is more effective in promoting the welfare of children than reacting later.

As individual teachers we are aware when things are not going well for a child and it is our responsibility to ensure that any identified need is reported to either the Deputy Head Pastoral (Junior School), Head of Year, Deputy Head (Pastoral and Student Progress), Deputy Head (Academic and Innovation), Director of Sixth Form, Senior Deputy Head or Head as appropriate. In this way we can ensure that issues are fully discussed, and the necessary guidance or referral made to support the child. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an Early Help assessment.

11.3 Education Welfare Officer

Regular attendance at school is a legal requirement. If attendance becomes a concern, then appropriate actions will be undertaken to draw this to the attention of parents/guardians and, if necessary, communication will be made with the Education Welfare Service to inform them of our concern. Children missing education must be dealt with appropriately and in a timescale that will disadvantage the student least. We will make reasonable enquiries where a student is absent without the School's

permission for a continuous period of 10 days or more or at any stage where there are concerns over the reasons for an absence.

11.4 Children's Social Care including Children in Need (Section 17) and Children in Need of Protection (Section 47)

Where a child has been identified as being a child in need or a child in need of protection, the School will work to ensure it liaises with the relevant individuals to ensure a co-ordinated offer. The DSL will ensure that staff know who these children are and understand their academic progress and attainment. The DSL will encourage all staff to maintain a culture of high aspirations for this cohort and will also support teaching staff to identify the challenges that children in this group face and the additional academic support and adjustments that they could make to best support these children.

If the DSL or Deputies feel a child is at risk of harm, they will always refer to the thresholds for the local authority in which the child resides and report to the relevant authority.

If the DSL or members of the Safeguarding Team are concerned about the action being taken by external agencies this matter will be discussed during the regular safeguarding meeting. If agreed it will be escalated, and the Head will be informed. Any complaints regarding conduct of professionals involved in supporting children will be shared with the DSL and discussed with the Head before contacting the relevant authorities.

The law with respect to Child Protection covers all children under the age of 18. Students who are 18+ may decide themselves whether to report abuse to the police, but they will still be supported by the School.

12. What to do if you are concerned about a child's welfare:

If you **suspect** that a child is being abused, alert the DSL, the Deputy Head (Pastoral and Student Progress), Jude Goodacre, who will advise on the best course of action. This may include referrals to pastoral support, Early Help or Children's Services. In her absence you should speak to the Senior Deputy Head, Andrew Whomsley or the Mental Health Lead, Emma Harbour. In the Junior School talk initially to the Junior School Head, Paula Pacyna, or if she is absent Jude Goodacre. You will subsequently need to document your concern in writing using CPOMS (amber safeguarding category) or on the yellow Cause for Concern form as soon as possible and alert the Safeguarding Team. If the abuse has been perpetrated by another child, refer both children.

If you **know** that a child is being abused you must speak **immediately** to the DSL, Jude Goodacre, or, in her absence the Senior Deputy Head, Andrew Whomsley, or the Head. **Do not delay your report.**

If, at any point, there is a risk of serious harm to a child, a referral should be made to children's social care immediately. You can call the emergency numbers listed in this document. Anyone can make a referral. If there is an immediate risk to the child's safety, call the police. You can also call the NSPCC 24-hour helpline. You do not need parental consent to refer through to statutory agencies.

- Even if unsure, always discuss your concerns with the DSL, Jude Goodacre, or, in her absence, the Senior Deputy Head (Andrew Whomsley) for Senior School

or Junior School Head (Paula Pacyna) for Junior School. If you think it, report it.

- Put your concerns in writing either using the yellow Cause for Concern Form or using CPOMs Yellow Form section) with dates and details of these suspicions and pass to the Safeguarding Team.
- If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.
- It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.
- Children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful. Staff should not be prevented from allowing professional curiosity to prompt a conversation with the DSL and should think carefully about the importance of building a trusted relationship with a child where abuse is suspected.

13. What to do if a child makes a disclosure:

Guidance for Staff

- A disclosure may happen at any time.
- Do not panic and think things have to happen instantly. It is more important that the right decision is made and therefore immediate referral to the DSL is essential.
- It is important to remind the child that you will have to pass on their concern.
- Confidentiality should not be promised. Make it clear that staff have a responsibility to share relevant information with the Deputy Head (Pastoral and Student Progress), who is the DSL.
- If you talk to a child, do so with tact and sympathy. Listen, but do not offer an opinion.
- Do not ask leading questions.
- When asking questions always ask open questions using the **TED** principle of **T**ell me, **E**xplain to me, **D**escribe to me.
- Do not let the child take the blame. A child cannot be held responsible for abuse received at the hands of an adult, older sibling or carer.
- Make careful and detailed legible notes (on the yellow form) – they may be needed later. Record the date, event, observation, disclosure and action taken.
- Pass the information and a written account to the DSL, Jude Goodacre, immediately.
- The DSL, Jude Goodacre, will either seek guidance from the LADO (Local Authority Designated Officer) or contact the Social Services Duty Desk. **She will decide whether it is appropriate to contact parents/guardians. Do not contact parents/guardians yourself.**

14. General Principles of Confidentiality

- All staff should be aware that personal information about a child and his/her family is confidential and should only be given to an appropriate person.

- If abuse is suspected accurate information must be given to the DSL immediately.
- Other teachers need only know enough to prepare them to act with sensitivity to a distressed child.
- If a child makes a disclosure, the child should be kept informed of who knows and why.
- Promises of confidentiality must not be given as a teacher has a duty to protect a child from abuse; all abuse must be reported.
- Teachers should not, in any circumstances, remove a child's clothing. They should only note those marks which they have noticed, or which are brought to their attention by the child.
- No further examination should be carried out.
- Teachers should not photograph the injury.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

If staff (teaching or support) hear worrying information about children from other parents/guardians, neighbours or even other children, this should be passed on to the DSL.

14.1 Monitoring and Record Keeping

The School can play a vital role in helping children and those who are suspected of being abused, by monitoring and recording certain aspects of the child's progress and behaviour in school.

Evidence from reports and reviews into the deaths of children indicate the vital importance of record keeping as indicated in the ['Working Together to Safeguard Children December 2023'](#). Early Help Assessment Referral Forms will be used by the School as well as references made to the referral thresholds as set by the Local Safeguarding Partners in which the child resides, to ensure support is provided as soon as a problem emerges at any point in a child's life.

<http://www.bedford.gov.uk/earlyhelp>

All staff are responsible for passing the following information to the DSL:

- Patterns of attendance.
- Changes in mood.
- Changes in classroom functioning.
- Relationships (with peers and adults).
- Behaviour.
- Statements made by the child, comments, stories, 'news', drawings.
- General demeanour and appearance.
- Home/family changes.
- Medicals.
- Response to PE/Sport.
- Injuries/marks – past and present.

The DSL will decide when to start and finish monitoring the child and decide upon further action to be taken.

The online management system, CPOMs, will be used to record all relevant information. All teaching staff, and where appropriate support staff, will have access to CPOMs and should input any concern however small using the 'add an incident' button.

The DSL is responsible for ensuring that records are shared promptly when children transfer schools and also ensuring a proactive approach when there are concerns about a child's wellbeing.

14.2 Referrals to Social Services (through MASH)

When the School makes a referral, thought must be given to the type of referral – 'What if', Early Help, child in need or child in need of protection.

For 'What if' ring MASH and ask for 'What if' advice.

Child in Need – use Early Help Assessment Referral Forms

<http://www.bedford.gov.uk/earlyhelp>

- Child Protection – ring The Multi Agency Safeguarding Hub (MASH) or equivalent for the area in which the child resides.
- When referring, anything said by the child should be written down as a verbatim report.
- Information will be recorded in factual, non-emotive, non-judgmental terms, with notes of the time, date and context of the events in question. A reference will be made on the child's file.
- The file will be kept centrally and confidentiality will be respected. Child Protection records will be kept securely locked either hard copy or electronically using the CPOMs system. A reference should be made on a child's school file that a Child Protection File exists. When the child transfers to a new school, the Child Protection File will be forwarded to the receiving school.

14.3 Child Protection Records, the Data Protection Act and GDPR

Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 1984. From September 2018, all Child Protection records will be kept online in CPOMS. For manual records the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which come to court, the court may require the School to provide its Child Protection records. The school is fully GDPR compliant and recognises and promotes that a fear of breaching data protection regulations should not stop staff taking action where necessary for the purposes of safeguarding and child protection.

14.4 Supporting the Child

If abuse is suspected, accurate information will be given only to the DSL. The School accepts that other staff need know only enough to prepare them to act with sensitivity to a distressed child.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of worth. They may experience feelings of helplessness, humiliation or self-blame.

15. Safer recruitment

Bedford Modern School is committed to safer recruitment and acts at all times in compliance with the Independent Standards Regulations. In addition to its safe recruitment procedures as set out in KCSiE 2024, members of staff (including contractors where appropriate), school proprietors and Governors are subject to the necessary child protection checks before starting work. A single Central Register is in place to record this.

All visitors are supervised at all times and required to wear a visitor badge or lanyard. All staff including Governors wear a lanyard or their staff badge when in school.

16. Online Safety

The School will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL and any parental engagement.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

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

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or staff are at risk it can be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

Our students are therefore taught how to stay safe in the online environment and how to mitigate risks, including but not limited to the risk of identity theft, bullying, harassment, grooming, stalking, radicalisation and abuse. Both the online safety policy and the ICT AUP are available online and cover both fixed and mobile internet devices provided by the school (such as PCs, laptops, webcams, tablets, whiteboards, digital video equipment, and so on), as well as all devices owned by students and staff brought onto school premises (such as personal laptops, tablets, smart phones). All users whether staff, governors, students or guests must read this policy and the ICT AUP prior to using their provided login details and upon their first login they must click/accept these policies. All parts of this Online Safety Policy and ICT AUP should be understood fully prior to acceptance and any questions that arise should be directed to the e-Safety Coordinator or the ICT Services and Innovations Manager.

Filtering and Monitoring

Governors and trustees are committed to doing everything they can to reasonable limit children's exposure to the above risks from the schools IT system. The Governors and Trustees are committed to following the DFE filtering and monitoring standards and making sure the school leadership team :

- Identify and assign roles and responsibilities to manage filtering and monitoring
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonable impacting teaching and learning

- Have effective monitoring strategies in place that meet safeguarding needs.

The Senior Leadership Team have ensured that the School has an appropriate filtering and monitoring software in place which works on all systems in school as well as the school virtual learning environment. There is also a group who meet to oversee the day-to-day operation of the systems and this group includes The Director of Operations, the Designated Safeguarding Lead, the Director of Digital Strategy and the ICT Services and Innovations Manager.

The IT Department will ensure that any software used is fit for purpose and meets the DFE standards. This will be reviewed regularly and at least annually or when:

- A safeguarding risk is identified;
- There is a change in working practice;
- Or new technology is introduced.

Members of the IT Department will ensure that support, training and technical advice on how to use the system is available for all staff as necessary. The Director of Digital Strategy will ensure all teaching staff are able to use the monitoring software for use in lessons.

A dedicated and trained member of staff receives, records and monitors any concerns and alerts the relevant pastoral staff as soon as possible.

The DSL will ensure that the dedicated member of staff is trained in the relevant safeguarding procedures and has access to information that enables them to know how and when to alert pastoral staff.

The DSL will ensure that appropriate interventions take place based on each individual case, working closely with the pastoral teams across the school.

Along with the dedicated member of staff and other members of the School Leadership and Management Team and NSG, the DSL will take a lead role in the review (at least annually) of the filtering and monitoring system looking at:

- The risk profile of the students
- The current filtering system -why blocked/not blocked
- Specific safeguarding issues that may emerge either in school, locally or nationally
- Relevant safeguarding reports
- Digital resilience of students (based on reports from pastoral staff and recorded on CPOMS)
- Teaching requirements (including RHSE and PSHE curriculum)
- Any specific use case (including BYOD)
- Safeguarding Policies
- Current checks and subsequent actions

The Deputy Head Academic and Assistant Head Academic will work with the DSL, the dedicated member of staff and the IT Department to ensure that the filtering system does not unreasonable impact on teaching and learning and does not restrict students from learning how to assess and manage risk themselves.

All staff will be trained in the importance of filtering and monitoring as part of their safeguarding responsibilities. All staff should report via email to the designated member of staff onlinesafeguardingalerts@bedmod.co.uk if

- They see or suspect unacceptable content has been accessed.
- They see unacceptable content can be accessed.
- They will be teaching content that could cause a spike in logs.
- There is a failure or abuse of the system.
- They perceive there are unreasonable restrictions.
- They note abbreviations or misspellings that allow access to unacceptable content.

If any staff is concerned there is an immediate safeguarding risk to a student they should follow the procedures laid out in this policy.

All staff should also be aware that some children are more vulnerable to online risks.

Mobile Devices

Filtering and monitoring is in place whenever a member of the school community accesses the internet on a mobile device via the School's BYOD wireless network. Devices are regularly audited and managed centrally.

Use of 3G,4G or 5G data

The School acknowledges that students may have access to unfiltered data from their own devices and therefore this increases the risk of harm. Therefore, the following is in place:

Students in Years 7 -11 are not allowed to use their mobile devices in school unless supervised.

Students in Years 12-13 are only allowed to use their mobile devices in supervised areas such as the Oakley and Wilden Rooms, the Refectory at breaktime and during lesson time only when necessary and under close supervision.

Staff are trained to be alert to the possibility that students could be harmed or harm others online whilst using their mobile phones.

17. Visitors to the school

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign in using the electronic system and wear a visitor's badge. Visitors will be expected to read and sign to say they agree to follow the Visitor's Protocol whilst on the school site.

Contractors (see Appendix A)

Permanent Contractors – will have been subject to the correct level of checks and training and will be issued with a BMS red lanyard. They can move about unsupervised and do not need to be monitored. This includes site foremen for RAAC areas.

Regular Contractors/Visitors – will have been subject to the correct level of checks and will either be easily identifiable by their own lanyard (e.g. Sports Coaches or CAMHs workers or will be issued with a purple lanyard – this applies particularly to RAAC workers. These contractors should be monitored – i.e. checked regularly or reported if they are in an unexpected area.

Temporary Contractors/Visitors – must wear a visitor's badge and be supervised at all times.

Visiting Speakers

We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

Whilst this policy attempts to cover all eventualities, it is vital that it is always viewed in conjunction with government advice for schools and statutory guidance.

Visiting Speakers Protocol

When inviting any visiting speaker into school or online, staff will ensure that the speaker/s are suitable and appropriately supervised. Staff are required to complete the Visiting Speakers Form in good time and approval should be requested from the relevant member of the safeguarding team depending on the age of the students or from the DSL or whole school DDSL in the case of a query.

18. Use of school or college premises for non-school/college activities

Governors and Trustees will ensure that any organisations or individuals that hire out school premises have effective safeguarding arrangements in place. This will be included in any agreements as a condition of use and occupation of the premises and that failure to comply would lead to a termination of the agreement.

**Mrs J Goodacre
Deputy Head (Pastoral and Student Progress)
Designated Safeguarding Lead**

**January 2025
Review Date September 2025**

Contractors Working on Site

Summary

This guidance has been drawn up to ensure the effective safeguarding of children where contractors are used in school.

Scope

This guidance is intended for all contractors employed by the School including those who are constructing new accommodation, routine maintenance or emergency repairs including catering and cleaning staff. This guidance will also apply to consultants employed on the building or maintenance project, and the term contractor shall mean contractor or consultant.

Aims

To provide clear guidance for all members of the school community on how we will manage contractors on our school site

Introduction

This guidance states what arrangements will be employed by the School where contractors are employed to work on site.

Contractors are visitors who are likely to support, maintain or improve our buildings, grounds or the resources within them.

This may include services like:

- maintenance e.g. plumbing, electrical, roofing
- servicing equipment such as photocopiers
- grounds maintenance including site surveys

These visits are clearly crucial and many have legal or Health and Safety requirements such as play equipment inspection or annual tree surveys.

Contractors at BMS also include catering and cleaning staff for whom the school is likely to have a contract whereby services are provided on a daily basis.

Regardless of the type of Contractor the KCSIE 2024 states in para 290:

Schools and colleges should ensure that any contractor or any employee of the contractor who is to work at the school or college has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check including children's barred list information.

Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. Schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances.

Permanent Contractors

The following staff are considered 'Permanent Contractors' for the benefit of this guidance:

Catering Staff employed by Holroyd Howe

Cleaning Staff employed by Everbrite

In addition to this certain named individuals who are employed during the RAAC Improvements/building works will be considered permanent contractors.

All permanent contractors will be expected to sign to confirm they have read and will follow all appropriate BMS Policies including but not limited to:

- Safeguarding and Child Protection Policy
- Senior School Behaviour Policy
- Staff Code of Conduct

All permanent contractors will be subject to an enhanced DBS check including children's barred list information and expected to undertake BMS Safeguarding Training on induction and on a regular basis in consultation with DSL.

These contractors will be issued with a red lanyard and will be able to move around the site unsupervised.

If permanent contractors are subject to an SLA with the school specific information about safeguarding will be included and in line with KCSIE 2024.

Regular Contractors

Regular Contractors are the those who visit the school on a regular basis including those Contractors who are employed to work in areas of the school which are segregated but could allow for brief unsupervised contact. Therefore they will be:

- be subject to an enhanced DBS and barred list check.
- be monitored by a relevant member of school staff or a permanent contractor during their time on site.
- expected to sign in at reception or at the site office (for those who are working in designated RAAC areas)
- expected to agree to follow the Contractors Code of Conduct and will be issued with a purple lanyard and relevant safeguarding information.

On the agreement of the DSL and Director of Operations, regular Contractors do not need to be monitored for safeguarding purposes during the periods when the school is closed to students and children.

For the purposes of this guidance 'monitoring' means that a member of BMS staff must check regularly on the individual over a period of time. The amount and type of monitoring will depend on the time, type and the area in which the work will take place. The more likely there is to be unsupervised contact between the regular contractor and children – the greater the need for monitoring.

Where there is a SLA in place for regular Contractors during the RAAC period the following will be written into the contract.

Safeguarding expectations are that all contractors and operatives must have an Enhanced DBS check; the school must be provided with copies of Enhanced DBS and ID for each contractor/operative that will be working on site regularly. BMS will provide ... the Principal Contractor, with a CONDENSED Code of Conduct and a Power Point. it will be M&J's responsibility to ensure that all operatives read such documents. BMS will provide 'purple lanyards' to M&J; it will their responsibility to issue such lanyards to all those operatives who have signed to say they have read the condensed code of conduct/safeguarding training slides; purple lanyards must be worn by operatives IF moving outside their building site compound, so that they can be always identifiable by any staff at BMS. Contractors will not be permitted to enter any other section of the school that are not directly affected by the works unless given prior authorisation via the Site Manager or another authorised school administrator.

It is expected that site foremen, contract managers and other key individuals as identified by the Principal Contractor, who may need to move freely, i.e. unsupervised, across school premises, must attend face-to-face BMS Safeguarding Training and read the FULL Code of Conduct. They will be issued a RED lanyard at all times whilst on BMS premises. Temporary contractors, will be issued the usual visitor badge and will need to be supervised at all times.

Temporary Contractors

Temporary Contractors are any visiting contractors who are not in regulated activity or are on site only during period where the school is closed to students or children. Temporary Contractors will be supervised at all times. For the purposes of this guidance 'supervision' means that the Contractor can only work in the school when directly supervised by a member of BMS Staff.

- All temporary Contractors will be expected to:
- Sign in at reception and present ID if and when required.
- Wear the ID badge presented.
- Agree to follow the Visitors/Contractors Code of Conduct whilst on the site

Responsibilities

All people working with children and young people are responsible for the safeguarding of the children in their care and they shall be responsible for ensuring that adequate measures are in place to safeguard students whilst contractors are on the premises. The School has a whole school approach to Safeguarding.

Safeguarding Measures during the period of RAAC/rebuild

The aim of the safeguarding measures will be to manage the risk of harm to pupils and vulnerable adults. **The measures adopted shall be proportionate to the risk.**

Safeguarding measures to be considered will include any or all of the following depending on the outcomes identified by the school in their security risk assessment:

- **Segregate;** To avoid contact* between contractors and pupils as far as possible
- **Supervise;** To supervise any contact* that does take place with a member of staff or a suitably vetted volunteer
- **Code of conduct;** To require contractors to observe a code of conduct
- **Regulate Access;** To regulate access to the premises
- **Checks;** To undertake checks where appropriate.

* 'Contact' in this context shall be taken to mean any opportunity for contractors' staff to converse with pupils or to communicate with them in any other way, e.g. by passing messages, without a member of staff or suitably vetted volunteer being able to monitor the contact and intervene where necessary.

Segregate

The risk of harm to pupils can be managed if contact between non-vetted contractors' staff and pupils can be avoided altogether. Segregation can be achieved by physical means or by time, or by a combination of both.

For larger building projects lasting a number of weeks physical separation would normally be achieved by the contractors' staff working within secure areas behind fencing, hoardings, barriers and the like where pupils would normally be excluded for routine health and safety concerns.

Outside such secure areas, separation can be maintained by confining the movements of the contractors' staff to specific areas and to specific times so as to avoid contact at break times and at the beginning and at the end of the school day. In this context a

marked up plan agreed with the contractor to show where and at what times during the day access will be permitted will be shared.

For routine maintenance visits or for emergency repairs lasting less than a day physical separation can be achieved by simply confining the movements of contractors to within clearly defined areas and specific times. Should any contact between the contractors' staff and pupils occur then it should be supervised by a member of staff or suitably vetted volunteer.

Where works are to be undertaken outside school hours then safeguarding measures should be implemented for any pupil attendance in school outside normal school hours.

Supervise

Measures should always be instigated to segregate non-vetted contractors' staff from pupils as much as is possible not just in the context of this document but also for H&S reasons. However, where such measures to segregate are in place but some contact may occur between non-vetted contractors' staff and pupils then any such contact should always be supervised by a member of staff or suitably vetted volunteer (i.e. someone who has read our Code of Conduct and received Safeguarding Training with our DSL).

As noted above, 'contact' shall be taken to mean any opportunity for contractors' staff to converse with pupils or to communicate with them in any other way, e.g. by passing messages, without a member of staff or suitably vetted volunteer being able to monitor the contact and to intervene where necessary.

'Supervise' will be taken to mean the ability for a member of staff or suitably vetted volunteer to monitor conversation or communication of any kind between contractors' staff and pupils and to intervene where necessary.

The requirement to supervise can be limited to the times when contact is likely to occur, e.g. at break times, class changeover times and at the beginning and at the end of the school day. It is not necessary to monitor the building works themselves, only any contact that might take place between the contractors' staff and pupils.

Dynamic Safeguarding

In addition to the above procedures and in order to support the rapid delivery of the project ensuring safe and effective care of all students, the following will apply during the period of September 2024 – December 2024. During this time RAAC Contractors will mostly be present in two distinct compounds and will be expected to move between the two through the centre of the school. This area also has the office of the DHP and will be added to any duty route to provide additional reassurance. Students in Years 3-11 will not be allowed to traverse near the Compounds. Music staff will be alert to any issues and the Music Administrator will also be asked to keep an eye.

All staff have been encouraged to challenge staff not wearing a lanyard. Additional signs reminding Contractors of their responsibility to wear them will be placed on the Compound.

Project Manager and site manager will carry out regular spot checks and discuss and record any near misses or other incidents related to safeguarding reports during regular meeting. Project Manager will meet with DSL twice a month to check in.

Code of conduct for Contractors working in designated areas during Academic Year 2024-25

Purpose:

Relationships with fellow staff, employees, governors, contractors, visitors, volunteers, students and their parents, guardians or carers should be reasonable and mutually respectful at all times. This Code has been formulated in order to maintain this balance and in line with the following guidance: *Guidance for safer working practice for adults who work with children and young people in education settings together with "Keeping Children Safe In Education" and the School's Safeguarding Policy.*

The purpose of the Code is to place the welfare of children at the centre of the School and its culture:

- confirm and reinforce the professional responsibilities of staff (both teaching and non-teaching)
- clarify the legal position in relation to sensitive aspects of staff / student relationships and communication including the use of social media
- set out the expectations of standards and behaviour to be maintained within the School
- to help adults establish safe practices and reduce the risk of false accusations or improper conduct.

Guiding principles

Principles for all staff

All staff should consider the welfare of the child as paramount and put their wellbeing, development and progress first by:

- taking all reasonable steps to ensure the safety and wellbeing of students
- be familiar with the School's Safeguarding and Child Protection procedures
- knowing the identity of the current Designated Safeguarding Lead and their Deputies
- being aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the student due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten students.

All staff should demonstrate respect for diversity and take steps to promote equality by:

- acting appropriately and in accordance with this Code of Conduct, towards all students, parents, guardians or carers and colleagues
- Complying with the Human Rights Act and the Equality Act 2010 and ensuring they act in line with their legal duties as laid out in KCSIE
- complying with the School's Behaviour, Anti-Bullying, Equal Opportunities and Dignity at Work Policies and this Code of Conduct
- addressing issues of discrimination and bullying whenever they arise
- And maintaining a whole school approach that prepares students for life in modern Britain and creates a culture of **zero tolerance** for sexism misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- recognise the importance of challenging inappropriate behaviours between peers and never downplaying or dismissing sexual harassment as 'boys being boys' 'part of growing up' or 'just banter'

Confidentiality

All staff should ensure they are fully aware of GDPR and Data Protection Policies and apply those principles when considering sharing confidential information.

Guidance on Staff / Student relationships

Application: Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required to ensure the safety of children in our care, and to reduce the risk of an allegation of impropriety against a member of staff. This guidance applies to all adults working in this School, and not just teachers.

General guidance: You should be aware of the general guidance that will apply in all cases. In particular you:

- need to exercise professional judgment but always act within the spirit of these guidelines. If you are involved in a situation where no specific guidance exists, you should discuss the circumstances with the Designated Safeguarding Lead. A written record should be kept that includes justification for any action taken
- must be familiar with procedures for handling allegations against staff
- must be aware of the School's child protection procedures
- must seek guidance from the Designated Safeguarding Lead if you are in any doubt about appropriate conduct
- must report any actions which could be misinterpreted, any misunderstandings, accidents or threats involving you and a student or a group of students to the Designated Safeguarding Lead.

Behaviour giving particular cause for concern: You should take particular care when dealing with a student who:

- appears to be emotionally distressed, or generally vulnerable and / or who is seeking expressions of affection
- appears to hold a grudge against you
- acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is overfamiliar
- may have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations.

Procedure to be followed in these cases: Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to the Designated Safeguarding Lead under the School's child protection procedures.

Record keeping: Comprehensive records are essential. Any incident involving children that could give cause for concern, whether contemplated in these guidelines or not, should be recorded, with justifications for any action taken. In addition, any incident should be reported promptly to the Designated Safeguarding Lead.

Language and appearance

Language: You should use appropriate language at all times. You should:

- avoid words or expressions that have any unnecessary sexual content or innuendo, avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, e-mails etc)
- avoid any form of aggressive or threatening words
- avoid any words or actions that are over-familiar
- not swear, blaspheme or use any sort of offensive language in front of students
- avoid the use of sarcasm or derogatory words when punishing or disciplining students and avoid making unprofessional personal comments about anyone. Any sanctions should be in accordance with the School's Behaviour Policies

Dress: You should dress appropriately and in a professional manner. Dress must not be offensive, distracting, revealing, or sexually provocative, embarrassing or discriminatory. Political or other contentious slogans or badges are not allowed.

Social contact: You should be aware that where you meet children or parents, guardians or carers socially, such contact could be misinterpreted as grooming. Any social contact that could give rise to concern should be reported to one of the Deputy Heads / Head.

Communication with students (including the use of technology)

Communicating with children and parents, guardians or carers: All communication with children or parents, guardians or carers should conform to school policy and be limited to professional matters.

Application: These rules apply to any form of communication including new technologies such as mobile telephones, web-cameras, social net-working websites and blogs. You should also ensure you comply with the relevant school policies.

Dealing with 'crushes': Crushes, fixations or infatuations are part of normal adolescent development. However, they need sensitive handling to avoid allegations of exploitation. Such crushes carry a high risk of words, actions and expressions being misinterpreted, therefore, the highest levels of professionalism are required. If you suspect that a student has a crush on you or on another colleague, you should bring it to the attention of senior colleagues at the earliest opportunity.

Acceptable use: Adults must establish safe and responsible online behaviours and must be familiar with the protocols set out in the Safeguarding and Child Protection Policy.

Personal details: Adults should not give their personal contact details to students, including email addresses, home or mobile telephone numbers, unless the need to do so is agreed with senior colleagues and parents, guardians or carers.

Code of conduct for photographs and videos

Permission required: You should seek permission before taking photographs or video camera footage of any students in class, at any school events or on a trip. You should also seek permission before displaying these photographs. You must not take images of children using personal mobile telephones.

Appropriate material: You must ensure children are not exposed to inappropriate or indecent images. Inappropriate material, such as pornography, should not be brought to work. If you discover material that is potentially illegal, you must isolate the equipment and contact the Designated Safeguarding Lead under the School's child protection procedures immediately.

Sexual contact

Sexual contact: Staff must not:

- have any type of sexual relationship with a student or students
- have sexually suggestive or provocative communications with a student
- make sexual remarks to or about a student
- discuss their own sexual relationships in the presence of students.

Sexual relationships or contact with students or encouraging a relationship to develop in a way which might lead to a sexual relationship is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution.

Safeguarding expectations are that all contractors and operatives must have an Enhanced DBS.

Any order for works or building contracts should be let with a clear condition that failure to observe the code will entitle the school to exclude a member of a contractors' staff from the premises.

Visitor's Notice

We extend a warm welcome to all our visitors; please familiarise yourself with these important safety issues:

1. All visitors should understand their responsibilities to safeguard and promote the welfare of students and should pay attention to the Safeguarding information below.
2. All visitors must sign in and out and will be accompanied at all times.
3. Visitors must wear their lanyard provided by reception at all times and be prepared to provide identification if requested.
4. Visitors should not consume or be under the influence of alcohol or any substance which may affect their behaviour whilst on site (including prescribed medication).
5. Visitors must not discriminate against any member of the school community because of any protected characteristic.
6. Abuse of any kind towards students, members of staff, volunteers or visitors will not be tolerated.
7. Visitors must not use a mobile phone whilst walking around the site and are not permitted to take photos or videos of children in the school (unless specific permission has been granted by a member of the Leadership Team).
8. Visitors should remain politically impartial, or allow for an equally balanced view to be presented to students.
9. Radicalisation or inciting hatred of any kind will not be tolerated and visitors will be asked to leave if it is felt that their behaviour is deemed inappropriate for the audience being spoken to.

Fire Action

1. In the event of a fire or other emergency the evacuation sounders will activate.
2. Please stay with your host and leave the building by the nearest emergency exit.
3. Please do not stop to collect personal possessions.
4. Please report to the visitor assembly area which is at the front of the School.
5. Please do not re-enter the building until advised to do so.

What to do if you have a concern

Key Contacts

Bedford Modern School



DSL: Mrs Jude Goodacre
jgoodacre@bedmod.co.uk

If you **suspect** that a child is being abused, speak to the Designated Safeguarding Lead, the Deputy Head (Pastoral and Student Progress), Jude Goodacre, who will advise on the best course of action.

If, at any point, there is a risk of serious harm to a child, a referral should be made to children's social care immediately. You can call the emergency numbers listed in this handbook. Anyone can make a referral. If there is an immediate risk to the child's safety, call the police. You can also call the NSPCC 24 hour helpline.

**NSPCC 24 Helpline 0800 800 5000
Childline 0800 1111**



DDSL: Mr Jonathan Bungard
jbungard@bedmod.co.uk

If you **suspect** that a child is being abused, speak to the Deputy Designated Safeguarding Lead, Deputy Head Pastoral (Junior School), Mr Jonathan Bungard, who will advise on the best course of action.

If, at any point, there is a risk of serious harm to a child, a referral should be made to children's social care immediately. You can call the emergency numbers listed in this handbook. Anyone can make a referral. If there is an immediate risk to the child's safety, call the police. You can also call the NSPCC 24 hour helpline.

NSPCC 24 Helpline 0800 800 5000
Childline 0800 1111

Visiting Speakers Protocol

When inviting any visiting speakers into school or online, staff will ensure that the speaker/s are suitable and appropriately supervised.

Suitability is defined as ensuring that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. In addition, the School will also be mindful of the duty regarding political impartiality and ensure there is a balanced presentation of political issues. Staff will need to complete the visiting speakers risk assessment.

Date of intended visit:
Name of Organiser/Supervisor:
Name of Visiting Speaker: Has the speaker visited the school before? Is the speaker a regular speaker at the school? How is the speaker known to the school?
Educational purpose of visit: Title or subject to be addressed: Expected audience (i.e. year group):
Presentation and materials checked for education value and age appropriateness: Checks carried out by:
Does the speaker possess a DBS? Has photo ID been provided? Have HR checks been completed if necessary?
Internet search (e.g. Google) completed?
Possible safety risks associated with the visiting speaker:
Possible reputational risks associated with the visiting speaker:
Based on the above, does a full risk assessment need to be undertaken for this visiting speaker? Yes / No
Details of any other checks completed:

I am not aware of any issues relating to the speaker that might be of concern under the Prevent Duty, or our duty of care to the students of the school and wider community.

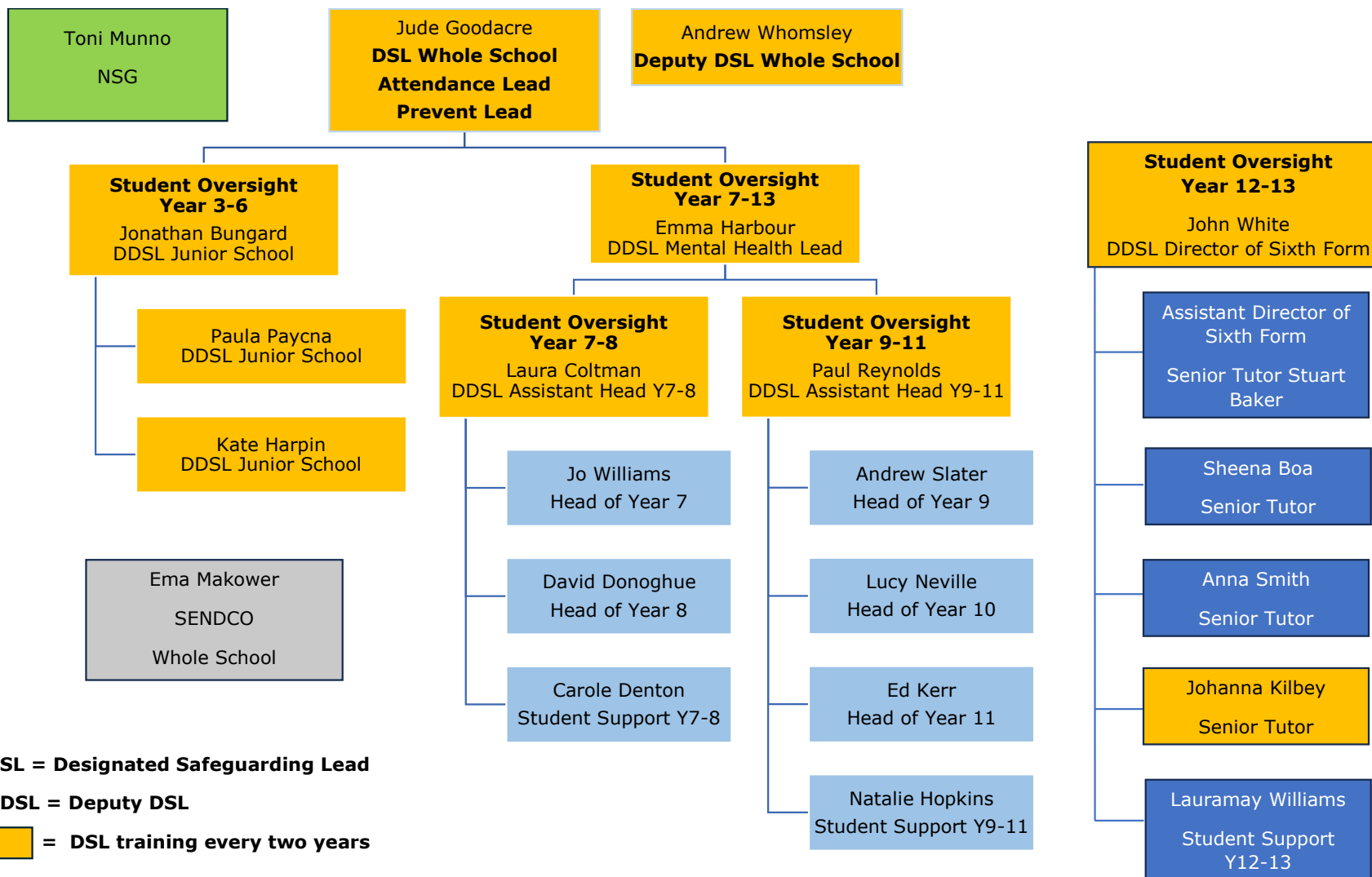
Photo ID for the speaker to be provided on their arrival and the visitor/s will sign to confirm they have read our Visitor's Notice

If there is a cost involved:

Have the costs been agreed with the budget holder/Finance?

Has method of payment and payment terms been agreed?

Safeguarding Structure



Monitoring and Filtering Procedures

Concern	Action
If you see or suspect unacceptable content accessed:	Report to onlinesafeguardingalerts@bedmod.co.uk If it is a safeguarding concern, also use the usual procedure.
If you see that unacceptable content can be accessed:	Report to onlinesafeguardingalerts@bedmod.co.uk Copy in IT support.
If you are teaching content that could cause a spike in logs:	Report to onlinesafeguardingalerts@bedmod.co.uk Copy in E-Safety Co-ordinator DDonoghue@bedmod.co.uk
If you think the system has failed:	Immediately report this to ITSupport@bedmod.co.uk Copy in afelice@bedmod.co.uk and JGoodacre@bedmod.co.uk
If you suspect a student is abusing the system:	Immediately report to JGoodacre@bedmod.co.uk Copy in the relevant Head of Year, Senior Tutor or Deputy Head Pastoral (Junior School)
If you suspect a staff member is abusing the system:	Immediately report to either the Head or the DSL, in line with the Safeguarding and Low-level Concerns Policy.
If you have perceived unreasonable restrictions on Teaching and Learning:	Report to the Deputy Head (Academic and Innovation) or Assistant Head (Teaching and Learning).
If you notice abbreviations or misspellings allow any access to unacceptable content:	Report to onlinesafeguardingalerts@bedmod.co.uk
If a student accesses unacceptable content:	Monitoring and filtering software will alert onlinesafeguardingalerts@bedmod.co.uk who will follow the procedure below:

All cases will be triaged and categorised as red, amber or green. David Donoghue (E-Safety Co-ordinator) to provide further guidance in the coming weeks.

Red Alert: In need of urgent intervention and checking with the potential for significant harm. Designated Safeguarding Team notified (**ELH to lead liaising with relevant staff**, EXM, JPW, JAG, LLC, PSR, PSP, DJD).

Amber Alert: In need of further investigation with the potential to have moderate to severe consequences. Year Teams and Heads of Faculty (where appropriate) notified – tutor/class teacher for information. (HOY to lead and liaise with HOF, tutor)

Green alert: In need of consideration and possible intervention. Tutor/class teacher notified.

All staff should also be alert to the fact that monitoring and filtering systems are never 100% and therefore should be vigilant using: physical monitoring, live software viewing, monitoring user logs where appropriate and monitoring individual devices.

Luton and Bedfordshire Prevent in Education Referral Process



Luton and Bedfordshire Prevent in Education Referral Process



Are you worried that a person is at risk of extremist behaviour or radicalisation?

- Observe concern, listen to disclosure
- Record concern as per organisation's safeguarding procedure
- Talk with Designated Safeguarding Lead (DSL)



The first steps you can take

- Speak with the child/person to get a better understanding of what they are saying
- Are there any reasons for the change in behaviour?
- If appropriate check with parent/carer unless it could put the child/person at further risk of harm
- Talk with DSL
- Beds Prevent police team preventreferrals@beds.police.uk



If Practitioner still has concerns, make referral

- Referral is made by completing the Prevent National Referral Form which is sent directly to Beds police preventreferrals@beds.police.uk
- Referral can also be made via Beds Police website www.beds.police.uk/advice/advice-and-information/t/prevent/prevent/beta/prevent-team-referral/
- If there are any other safeguarding concerns they will need to be made in the same way as all other safeguarding referrals. Please mention that you have made a Prevent referral

Remember: consent is NOT needed when making Prevent referrals