



Instill confidence
Inspire creativity
Increase connections
Improve communication skills

Child Protection Policy

What you need to know to help protect students under the age of 18 from harm including how to act upon and record suspected, alleged or actual abuse.

Revised edition February 2026 approved by:

Helen Feather
SEND Director and DSL

Next review date: August 2026

Item	Contents	Page
1	Statement of Purpose	2
2	Important Safeguarding Contacts	3
3	Legislation and Guidance	3
4	Definitions: Safeguarding and Child Protection	5
5	Equality Statement	6
6	Roles and Responsibilities of Staff	7
7	Confidentiality	10
8	Recognise and Respond to Abuse, Neglect and Exploitation	11
9	Online Safety	17
10	Managing Safeguarding Concerns or Allegations Made About Staff	19
11	Safer Recruitment Process	23
12	Record Keeping	24
13	Safeguarding Training and Development	25
	APPENDIX 1: Types of Abuse	25
	APPENDIX 2: Writing a Safeguarding Report	30

1. Statement of Purpose

For the purposes of this document 'students, children and young people' will refer to anybody under the age of eighteen. Bedazzle refers to all children and adults enrolled on their courses as 'students'. Although this document focuses on issues relating to those with learning difficulties and/or disabilities, it is as relevant to all young people, including those with physical impairments. Many points also apply to adults over eighteen who have been assessed as needing care and support.

Everyone has the right to be protected from both the fear and reality of abuse, and we are fully committed to safeguarding the welfare of all students who come into contact with our services.

Bedazzle is committed to reviewing its safeguarding policies and procedures at regular intervals. Any comments or proposed additions or amendments to this document should be forwarded to Helen Feather. If anyone feels that Bedazzle has failed to meet the requirements outlined in this document they are encouraged to air their concerns to Diane Janssen.

2. Important Safeguarding Contacts

Bedazzle in-house contacts:

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Helen Feather	HelenFeather@BedazzleArts.Org 07494091077
Director	Diane Janssen	DianeJanssen@BedazzleArts.Org 07841990611

External contacts:

Organisation / Role	Contact details
Cambridgeshire LADO	Email: LADO@cambridgeshire.gov.uk Telephone: 01223 727 967 (Monday to Friday during office opening hours) Telephone: 01733 234 724 (Emergency Duty Team - out of hours queries)
Cambridgeshire & Peterborough Children and Young People's Social Care	0345 045 5203
Cambridgeshire & Peterborough Social Care Emergency Duty Team	01733 234724
Essex Consultation Line	0345 603 7627
Essex Emergency Duty Team	0345 606 1212
Emergency Services	999 or 112
Non-emergency medical helpline	111
Non-emergency police helpline	101
Cambridgeshire police (non-emergency)	0845 456 4564
Addenbrooke's Hospital	01223 245151
NSPCC Child Protection Helpline	0808 800 5000

3. Legislation and Guidance

This Child Protection Policy is based on the Department for Education's (DfE's) statutory guidance:

Keeping Children Safe in Education (KCSiE)	<p>This sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.</p>
Working Together to Safeguard Children	<p>This is DfE guidance outlining what organisations and agencies must and should do to help, protect, and promote the welfare of all children and young people under the age of 18 in England.</p>
The Non-Maintained Special Schools (England) Regulations 2015	<p>Part 1 of the schedule places a duty on non-maintained special schools to safeguard and promote the welfare of students.</p>
<p>The Children Act 1989 (and 2004 amendment)</p>	<p>This provides a framework for the care and protection of children.</p>
<p>Serious Crime Act 2015, Female Genital Mutilation Act 2003</p>	<p>This places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.</p>
Multi-agency statutory guidance on Female Genital Mutilation	<p>This sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.</p>
Safeguarding Vulnerable Groups Act 2006	<p>Schedule 4 defines what 'regulated activity' is in relation to children.</p>
The Human Rights Act 1998	<p>This explains that being subjected to harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights - ECHR Official Texts - ECHR - ECHR / CEDH</p>

The Equality Act 2010	<p>This makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting pupils regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment</p>
Statutory guidance on the Prevent duty, Prevent duty guidance: England and Wales (2023)	<p>All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 to have “due regard to the need to prevent people from being drawn into terrorism”</p>
The Public Sector Equality Duty (PSED) EHRC	<p>This explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination</p>
Rehabilitation of Offenders Act 1974	<p>This outlines when people with criminal convictions can work with children</p>

4. Definitions: Safeguarding and Child Protection

All members of staff, including volunteers whether paid or unpaid, who come into contact with our students, need to know that keeping them safe is part of their responsibility. Because of the close contact with them, staff may well be the first persons to spot early signs and symptoms of abuse. All staff have the same legal responsibility to help safeguard children and young people from harm as set out in Section 11 of the ‘2004 Children Act’. (The same directives apply to ‘Vulnerable Adults’). Similarly, Bedazzle has a duty to take any concerns or allegations of abuse seriously.

Safeguarding is defined 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
- Taking action to enable all children to have the best outcomes.

Child Protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs in person or online, inside or outside the home.

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18.

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

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Section 9 provides the full definition.

Exploitation is a risk to children and young people that takes place outside of their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

NB the terms abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and their parents and carers) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

5. Equality Statement

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to

anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers, or protected characteristics they may have.

All staff understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole company approach to look and listen out particularly for young people who:

- have special educational needs, disabilities and/or health conditions
- are a young carer
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- are frequently missing/go missing from education, home, or care
- are at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- are at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- are in a family circumstance presenting challenges for the young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- are misusing alcohol and other drugs themselves
- are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- are looked after or previously looked after.

We recognise that our children with special educational needs, disabilities or additional health needs may face additional barriers. These can include but are not limited to:

- assumptions that indicators of possible abuse, such as behaviour, mood, and injury, relate to the child's impairment without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- assumptions that children with SEND can be disproportionately impacted by things like bullying - without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- a disabled child's understanding of abuse
- lack of choice/participation.

6. What To Do If You Have a Concern About a Child

All staff and volunteers have a duty to act if they are concerned about a child's safety or welfare. You do not need proof. You only need reasonable concern.

Step 1 – Recognise

- You may become concerned because:

- A child makes a disclosure
 - You observe injuries or behavioural changes
 - Another person raises a concern
 - You notice patterns over time
-

Step 2 – Respond

If a child speaks to you:

- Stay calm
 - Listen carefully
 - Do not interrupt
 - Do not ask leading questions
 - Do not promise confidentiality
 - Reassure the child they have done the right thing
 - Do not investigate
-

Step 3 – Record

- As soon as possible (and within 24 hours):
 - Record the concern on MyConcern
 - Use the child's own words
 - Record date, time, location and who was present
 - Record only factual information
 - Sign and date your record
-

Step 4 – Report

- Immediately inform one of the Designated Safeguarding Leads:
 - Helen Feather
 - If a child is in immediate danger, call 999 first and then inform a DSL.
-

Step 5 – Maintain Confidentiality

- Share information only on a need-to-know basis
- Do not discuss with colleagues unless directed
- Store all records securely
- If you feel your concern has not been taken seriously, follow the Whistleblowing Policy.
- 5.10 Allegations Against Staff or Volunteers
- An allegation may relate to a member of staff or volunteer who has:
- Harmed a child or may have harmed a child
- Possibly committed a criminal offence against a child
- Behaved in a way that indicates they may pose a risk to children
- Behaved in a way (including online) that may pose a risk to children
-

If you are not a manager and receive such an allegation:

- You Must:
- Listen and remain calm
- Not investigate
- Not question witnesses
- Not inform the person accused
- Record the information on MyConcern immediately

Report directly to a Designated Safeguarding Lead

- If the concern involves a DSL, report to the most senior leader available.
- If the concern involves the most senior leader, contact the Local Authority Designated Officer (LADO) directly.

- The Local Authority Designated Officer (LADO) manages and oversees allegations against adults who work with children.
- Bedazzle will report all allegations that meet the harm threshold to the LADO within one working day.
- **Cambridgeshire LADO Contact Details:**
Email: LADO@cambridgeshire.gov.uk

Telephone: 01223 727 967 (Monday to Friday during office opening hours)

Telephone: 01733 234 724 (Emergency Duty Team - out of hours queries)

Members of the public

Telephone: 0345 045 5203 (Monday to Friday 9am – 5pm)

Telephone 01733 234 724 (Emergency Duty team – out of hours queries)

7. Roles and Responsibilities of Staff

Safeguarding is everyone's responsibility. This policy applies to all staff and volunteers. It also applies to any arrangements for extended Bedazzle and off-site activities.

Bedazzle plays a crucial role in preventative education. This is in the context of a whole-company approach to preparing service users for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment.

This will be underpinned in our:

- Code of Conduct
- pastoral support
- relevant learning tasks which are bespoke to each individual service user's needs, tackling issues such as:
 - healthy and respectful relationships
 - boundaries and consent
 - stereotyping, prejudice, and equality
 - body confidence and self-esteem
 - how to recognise an abusive relationship (including coercive and controlling behaviour)
 - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - what constitutes sexual harassment and sexual violence and why they are always unacceptable.
 - online safety

All staff working with children will be required to:

- Read and understand **Part One** and **Annex B** of [Keeping Children Safe in Education](#), and the reviewed version of this guidance at least annually.
Translated versions of Part One Keeping Children Safe in Education can be found at [Keeping Children Safe in Education Part 1 Translations | LGFL for staff, volunteers, parents and carers](#) whose first language may not be English, should they wish to use this.
- Sign a declaration at the beginning of each academic year, or on appointment of role if this is part-way through, to confirm that they have read the guidance and understood the content.
- Promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online).
- Contribute to creating a culture for service users who are LGBTQ+ to speak out and share their concerns.
- Contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns.

All staff will be aware of:

- Our safeguarding systems, including:
 - this Child Protection Policy
 - Code of Conduct
 - the role and identity of the Designated Safeguarding Lead (DSL) and deputies
 - Lone Working Policy
 - Safer Recruitment Policy
 - Data Protection Policy and IT Security Policy
 - Whistleblowing policy
- Our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
- Signs of vulnerabilities to look out for in children who may benefit from Early Help support and what their role is in this to support DSL in ensuring children and their families receive support as soon as problems emerge.
- The importance of Early Help assessments and how they can help identify emerging difficulties and therefore how sharing information, including with other practitioners, can support early identification and assessment.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The process for recording and sharing information internally to DSL and on children's safeguarding records.
- The process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow.
- The signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or

involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) [See Annex B Keeping Children Safe in Education](#).

- How to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads.
- The importance of reassuring children that they are being taken seriously and that they will be supported and kept safe.
- The importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our school and professionals when issues emerge or become a concern.
- Children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online.
- Children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children.
- What to look for to identify children who need help or protection.
- How Bedazzle follows the Safer recruitment process as documented in the safer recruitment policy. As stated in this policy the regular training maintained to ensure that safer recruitment is paramount. Staff must understand the Safer Recruitment Policy to ensure that appropriate checks, vetting and safer hiring practices are consistently applied. This protects children by preventing unsuitable individuals from working with them and ensures compliance with statutory safeguarding requirements. All staff involved in recruitment must follow this policy to maintain a culture of vigilance and accountability.
- The importance of staff understanding the Whistleblowing Policy so they feel confident to raise concerns about unsafe practice, poor conduct, or safeguarding failures without fear of reprisal. This policy supports transparency, promotes a safeguarding culture, and ensures that concerns about colleagues or organisational practice are escalated appropriately in the best interests of children.

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

Our DSL team are members of our senior leadership team. Our DSL is Helen Feather. The DSL takes lead responsibility for Bedazzle's child protection and wider safeguarding arrangements. Whilst all of our staff are part of our safeguarding culture, it is the role of our DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise. The DSL will act as the main contact at Bedazzle when a child and their family are receiving support from the school, external agencies, and statutory services.

During term time, the DSL will be available during working hours for staff to discuss any safeguarding concerns. For out-of-hours or out-of-term time concerns, the DSL can be contacted via the following:

HelenFeather@BedazzleArts.Org (07494091077)

The DSL will be given the time, funding, training, resources, and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so when required.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly.
- Have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children.
- Have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer, or associated adults where necessary.
- Have a good understanding of the filtering and monitoring systems and processes in place within Bedazzle.
- Ensure that all staff are appropriately trained.

The DSL will also:

- Liaise with external agencies when there are safeguarding concerns, as appropriate.
- Share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Children's Social Care colleagues in order to prepare and implement Bedazzle's policies.
- Be confident about what local specialist support that is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment.
- Be aware that children are entitled to have an 'Appropriate Adult' to support and help them in Police investigations or if a threshold has been met for them to be searched.

The full responsibilities of the DSL are set out in their job description.

Role and Responsibilities of the Chief Operations Officer

Helen Feather is Bedazzle's Chief Operations Officer. As Chief Operations Officer, Helen will:

- Implement this policy and ensure that all staff:
 - Are informed of Bedazzle's systems which support safeguarding, including reading and understanding this policy, as part of their induction.
 - Follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect.
- Make this policy available to parents/carers, professionals, and the community to ensure there is transparency and clear expectations about the Bedazzle's duty to safeguarding and promote the welfare of children and the arrangements for responding to children presenting with needs that may require early help or support to protect them. This policy is available to all on our website at www.bedazzlearts.org.

- Ensure DSL have appropriate time, funding, training, and resources, and that there is always adequate cover if a DSL is absent.
- Act as the 'case manager' representing the company in the event of an allegation of abuse made against another member of staff or volunteer.
- Manage cases where there are low-level concerns regarding the conduct of staff or oversee delegation to other DSL.
- Ensure the relevant staffing ratios are met, where applicable
- Make sure each child is assigned a case manager to oversee their programme.

8. Confidentiality

The following principles apply in regards to confidentiality surrounding safeguarding:

- Timely information sharing is essential to effective safeguarding.
- The [Data Protection Act \(DPA\) 2018](#) does not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - Even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies.
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

The DSL should consider the following points:

- Parents or carers should normally be informed (unless this would put the child at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Children's Social Care where the child resides.
- Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- Have regard for the Government's publication [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/information-sharing-advice-for-safeguarding-practitioners) includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information with all relevant parties.

If staff are in any doubt about sharing information, they can seek advice from the Designated Safeguarding Leads.

9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Our staff are aware that children may be abused by an adult or adults or by another child or children.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect, and exploitation so that we can identify children who may be in need of help or protection at the earliest opportunity.

All staff are required to undergo Child Protection and Prevent training at the beginning of each academic year or upon appointment of role if this is part-way through. Detailed information about types of abuse is outlined in **APPENDIX 1**.

All our staff are expected to be aware of what Abuse, Neglect and Exploitation is and understand the different types of indicators which could suggest a child is suffering or likely to suffer harm.

If a child is suffering or likely to suffer from harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Where an allegation arises from suspicions of abuse, the member of staff who first becomes aware of the allegation, must bring this immediately or as soon as practically possible to the attention of a Designated Safeguarding Lead. If the concerns are regarding a Designated Safeguarding Lead, staff must approach the second DSL or the Director, Diane Janssen. The DSL will ensure that any reported incidents of abuse follow the legislation and statutory guidance for child protection and safeguarding adults.

The first person becoming aware of potential abuse does not have the responsibility to make a judgment about the validity of allegations or the seriousness of such, but must make known those allegations to the DSL. When presented with an allegation or suspicion of abuse, the alerting member of staff should assess whether anyone is at risk or is in immediate danger, then take any reasonable steps within their role to protect any person who may be at immediate risk or harm, for example:

- Call the police on 999 if a crime has taken place or is believed to have taken place.
- Call an ambulance or GP if someone needs urgent medical attention.
- Separate the alleged victim and alleged perpetrator, only if it is safe to do so. **Staff should never put themselves at risk.**
- Take responsible steps to preserve any evidence, if at a potential crime scene.
- Report concerns, verbally, to a Designated Safeguarding Lead as soon as practically possible.
- Make a written account of what has happened, or of what has been noticed or said, as soon as possible, remembering to record facts and not to make assumptions. Submit this report through MyConcern.
- Do not approach, confront or interview the alleged perpetrator unless this is within their role and is necessary to do so to ensure the safety or well-being of others. If necessary the alerter should try and obtain advice (preferably from Police) before doing so.

Tell the DSL as soon as possible if you make a referral directly.

To make a referral contact:

Cambridgeshire & Peterborough Children's Services	<ul style="list-style-type: none"> ● Customer Service Centre: 0345 045 5203 ● Emergency Duty Service: 01733 234724 ● CCC Safeguarding Children Referral Online Form ● PCC Safeguarding Children Referral Online Form
Essex County Council	<ul style="list-style-type: none"> ● Consultation Line: 0345 603 7627 ● Report a concern about a child online form

If a child makes a disclosure

Bedazzle is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children in the school. Staff are expected to be clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them. All staff must be aware that they should always be prepared as children can disclose spontaneously to anyone, anywhere.

Staff also know that children may not always feel ready or know how to tell someone that they are being abused, neglected, or exploited and do not always recognise their experiences as harmful.

We listen to children by:

- Showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves.
- Encouraging children to tell their story in their own words.

- Avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions/prompts.

We reassure children by:

- Making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff.
- We let a child know it is not their fault as children are often made to feel blame by those harming them.
- Never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm.
- Helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

Any member of staff who has any concerns about a child's welfare should:

- Maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality.
- Reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with.
- Record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rationale for this. Also ensure you make a note of any injuries observed or described by the child.
- Consider if the child needs medical attention and if so, prioritise ensuring they receive this.
- You must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the DSL.

Recording concerns

Our staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Our staff are clear that they must:

- Record all conversations relating to any level of concerns on MyConcern; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words.
- Inform a DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately.

Further detailed information about how to record a concern can be found in **APPENDIX 2**.

Our staff must be aware that such information is confidential and should be shared with the DSL only who may hold additional information about the child and their family and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the child and their family.

Concerns about child-on-child abuse

In most circumstances, incidents of service users harming other service users will be dealt with under Bedazzle's Code of Conduct, which can be found on the website at www.bedazzlearts.org.

Our Child Protection Policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

- is serious, and potentially a criminal offence.
- could put other Bedazzle service users at risk.
- is violent.
- involves service users being forced to use drugs or alcohol.
- involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

If a service user makes an allegation of abuse against another service user:

- Staff must record the allegation on MyConcern and report to the DSL; staff should not investigate the matter.
- The DSL will assess and consider the relevant next steps which may include, speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children's Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate.
- The DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the Bedazzle environment and beyond, for example off-site activities and transport to and from Bedazzle sessions.
- The DSL will speak to the child and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs.
- If the incident is a criminal offence, Bedazzle has a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidents which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child.

Our DSL are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSL will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.

Concerns about Female Genital Mutilation (FGM)

[Keeping Children Safe in Education](#) explains that FGM includes '*all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.*'

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'

Our staff must be aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are:

- Informed by a girl under 18 that an act of FGM has been carried out on her.
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).

The duty for staff above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, staff must report to the DSL who will follow local safeguarding procedures.

Concerns about radicalisation

We are compliant with the Counterterrorism and Security Act 2015. Under section 26, we exercise our duty to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*". This duty is known as the Prevent duty.

The Prevent duty is one of our wider safeguarding obligations. Our DSL are aware of the revised Prevent duty guidance for England and Wales, especially paragraphs 141-210, which are specifically concerned with education.

Our staff are aware that children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our company's safeguarding approach.

If staff have a concern, they must inform the DSL and submit a report on MyConcern. The DSL will consider the level of risk and decide which agency to make a referral to: Children's Services website or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The Department for Education also has a dedicated telephone helpline, **020 7340 7264**, which all staff can call to raise concerns about extremism for a service user. In non-emergency situations DSL can also email counter.extremism@education.gov.uk. In an emergency, call **999** or the confidential anti-terrorist hotline on **0800 789 321**.

Concerns about Mental Health

Mental Health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must log their concerns on MyConcern and speak to the DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support.

If a child is experiencing low moods, low self-esteem and general anxiety, our Mental Health First Aiders will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. Our Mental Health First Aider is Claire Bester.

If the child is presenting with a concerning level of low mood and anxiety for a period then the DSL will work with the MHFAs to discuss with the child and their parents/carer ways options of support that can be explored.

If someone is experiencing suicidal thoughts but they do not need physical input from A&E, then consideration will be given to accessing support from the Single Point of Access (SPA)/Crisis team. If a referral for targeted mental health support is required, then a referral through SPA will be made. If, however, a child/young person is at immediate risk they should be sent to A&E or dial **999**.

Creating a culture where children feel safe and minimising the risk of all forms of abuse

We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect, and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture at Bedazzle.

We expect all staff to:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure bespoke curriculums help to educate service users about appropriate behaviour and consent, where relevant.
- Ensure service users are aware of how they can raise and report concerns.
- Reassure victims that they are being taken seriously.
- Be alerted to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by us updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, and alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

Our staff are trained to understand:

- How to recognise the signs of child-on-child abuse and know how to identify it and respond to reports.
- Even if there are no reports of child-on-child abuse within Bedazzle, it does not mean it is not happening – staff should maintain an open mind and attitude of “it could happen here.”

- If they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and always speak to the DSL should they be unclear,
- Children may not always make a direct disclosure and therefore they must be aware that:
 - Children can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves.
 - A friend of the child may share information to a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open ended questions.
 - Staff may overhear a conversation between children.
 - A child's behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation.
 - Some children can face additional barriers to telling someone, for example they have a disability, special educational need, age, gender, ethnicity, and/or sexual orientation etc.
 - One child's concerning/abusive behaviour towards another could be an indicator of that child having been harmed themselves.

10 Online Safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, Bedazzle aims to:

- Have robust processes in place to ensure the online safety of service users and staff.
- Protect and educate the whole Bedazzle community to be safe and responsibly use technology, including mobile and smart technology.
- Set clear guidelines for the use of mobile phones for the whole Bedazzle community.
- Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education:

- **Content** – being exposed to illegal, inappropriate, or harmful content, for example: pornography, misinformation, disinformation, including fake news, and conspiracy theories., racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism
- **Contact** – being subjected to harmful online interaction with other users, for example: child-on-child 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** – online behaviour that increases the likelihood of, or causes harm, for example: making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and

online bullying; and

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing, and/or financial scams.

To meet our aims and address the risks above, we will educate service users as appropriate and relevant to them, about online safety as part of their bespoke curriculum. For example:

- The safe use of social media, the internet and technology.
- Keeping personal information private.
- How to recognise unacceptable behaviour online.
- Ensuring children know not to meet up with a person they have met online without a safe adult.
- How to report any incidents of cyber-bullying, ensuring service users are encouraged to do so, including where they are a witness rather than a victim.

We will also:

- Provide online safety lessons to service users and encourage staff to attend team refreshers on how to keep themselves safe online, as well as children. This will include issues for example: cyber-bullying, the risks of online radicalisation, and the roles and responsibilities around filtering and monitoring.
- Educate parents/carers about online safety through letters and emails sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their personal mobile phone and cameras, as detailed in our IT Security Policy.
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the Child Protection and Safeguarding policies, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

Generative artificial intelligence (AI)

Generative Artificial Intelligence (AI) technologies, such as tools that can create text, images, video, or audio, are increasingly being used in education, communication, and creative activities. At Bedazzle, we recognise both the opportunities and risks of generative AI. We are committed to promoting safe, ethical, and responsible use, ensuring that children are protected from harm while engaging with these technologies.

While these tools can provide benefits, they also present potential safeguarding risks for children and young people. Key safeguarding considerations around the use of AI include, but are not limited to:

- Misinformation and inappropriate content
- Impersonation and Deepfakes
- Data privacy
- Dependency and mental wellbeing

If you have any concerns regarding the child you are working with and their use of AI, contact a Designated Safeguarding Lead. This should also be reported through MyConcern.

Concerns about a member of staff

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including supply staff, external support workers, volunteer or contractor) posing a risk of harm to young people, speak to a DSL. If the concerns/allegations are about a DSL, speak to the second DSL or the Director, Diane Janssen.

For more detailed information regarding concerns about a member of staff, please see our Whistleblowing Policy.

11. Managing Safeguarding Concerns or Allegations Made About Staff

All staff at Bedazzle hold positions of trust and are expected to uphold safe working practices outlined in our Code of Conduct.

A 'position of trust' refers to any role where an adult holds power or influence over a child due to the nature of their work (either paid or voluntary). As defined in the [Sexual Offences Act 2003 \(Sections.16-24\)](#) and further clarified by the [Crown Prosecution Service](#), **it is a criminal offence for anyone in a position of trust to engage in sexual activity with a child in their care – even if that child is aged 16 or 17 and legally considered to have reached the age of sexual consent (16)**; this includes both in-person and online interaction, within or outside of employed/voluntary hours.

A **breach of trust** occurs when an adult working or volunteering with children crosses established boundaries in their professional relationship with a child or young person through inappropriate behaviour that involves an abuse of their position or authority. The behaviour itself does not need to be illegal to constitute a breach of trust – even when the child or young person is over the age of consent (16). These behaviours undermine professional integrity and breach safeguarding standards and the Bedazzle Code of Conduct, regardless of legal consent due to the imbalance of power and the professional duty of care.

Levels of Concern and Allegation

There are two levels of Concerns and Allegations relating to adults (in both paid and voluntary roles) working with children either directly and/or online:

1. Low-Level Concerns

These are behaviours by one or more adults (paid or voluntary) which are inconsistent with Bedazzle's Code of Conduct but do not meet the Harm Threshold and are referred to as 'Low-Level Concerns'. Examples include repeated breaches of the Code of Conduct in relation to safeguarding.

2. Allegations

These are behaviours by one or more adults (paid or voluntary) that do meet or may meet the Harm Threshold. Such cases require referral within one working day to the Local Authority Designated Officer (LADO) and potentially other statutory bodies such as the police or children's social care.

Low-Level Concerns and Allegations may emerge as a result of either observed suspicions or direct disclosures made by a child. In assessing the potential harm and impact to a child or young person, DSL will consider the four categories of abuse – physical, emotional, sexual and neglect – as well as any safeguarding elements related to exploitation. Detailed definitions of these terms can be found in **Appendix 1**. The Harm Test is explained in the [Disclosure and Barring service Guidance: Making barring referrals to the DBS and Section 31\(9\) of the Children Act 1989 \(as amended by the Adoption and Children Act 2002\)](#).

Managing Low-Level Concerns (those that DO NOT meet the Harm Threshold for Allegation)

As part of our whole-company approach to safeguarding, we are committed to fostering an open and transparent culture where all concerns involving adults working in or on behalf of Bedazzle (including supply staff, external support workers, volunteers and contractors) are addressed promptly and appropriately.

Creating an environment where all concerns can be shared responsibly, with the right person, recorded accurately, and handled with care is essential to keeping our children and young people safe.

We aim to:

- Enable all stakeholders to identify inappropriate, problematic, or concerning behaviour early and encourage them to do so.
- Reduce the risk of abuse by acting preventatively.
- Ensure that all adults working/volunteering in or on behalf of our company understand and adhere to professional boundaries consistent with our ethos and values at Bedazzle.

A 'Low-Level' Concern does not imply insignificance. It refers to any behaviour – however minor – that causes a sense of unease or a 'nagging doubt' about whether an adult's behaviour:

- Is inconsistent with Bedazzle's Code of Conduct, including inappropriate conduct outside of work, and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples may include (but are not limited to):

- Being over-friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating children.

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. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Role of the Case Manager for Low-Level Concerns

At Bedazzle, the Case Manager for dealing with Low-Level Concerns will be a member of senior management.

When a Low-Level Concern is raised (including third-party reports), the Case Manager or their nominated deputy will:

- Speak with the person who raised the concern (unless this was raised anonymously)
- Speak with the individual subject to the concern
- Identify and interview any other involved parties or witnesses

The information gathered will help us to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for our decisions and action taken.

The Case Manager or their nominated deputy will respond to reports of Low-Level Concerns in-line with the company's internal due processes for managing safe-staffing. Our response may include the following:

- Prioritise the safety and wellbeing of any alleged victim and all other pupils
- Share details only with those who need to know to maintain confidentiality
- Conduct further inquiries with relevant children, staff, parents, or witnesses
- If there are reasonable grounds, launch a formal internal investigation following Bedazzle's internal processes
- Consult Human Resources on possible breaches of the policies to assess disciplinary thresholds
- Inform the subject of the concerns and outline available support during the inquiry
- Determine when to allow the subject to present their account
- Review all evidence and decide on an outcome
- If no risk of harm is found, consider additional training or monitoring for the staff member
- If new information raises serious risk or meets the harm threshold, refer the matter to the LADO

Bedazzle fosters a safeguarding culture where every staff member is professionally curious. We:

- Clarify expected staff behaviour and help them distinguish it from concerning conduct
- Encourage prompt reporting of Low-Level Concerns
- Address unprofessional behaviour early and support corrective measures
- Handle concerns sensitively and in proportion to their nature
- Use reported concerns to identify and address any weaknesses in our safeguarding systems

Managing Allegations (those that DO MEET the Harm Threshold for LADO)

When concerns/allegations meet the Harm Threshold, Bedazzle is required to comply with Part Four of [Keeping Children Safe in Education](#).

All staff and volunteers at Bedazzle are required to immediately report any level of concerns about behaviour and/or conduct of an adult working/volunteering with children towards a child to a DSL.

These are our procedures for managing cases of concerns/allegations that meet the Harm Threshold and may indicate a person is a risk of harm to children if they continue to work in their present position, or in any capacity with children and young people. This is the process and the threshold criteria we apply if it is alleged that anyone working within the Bedazzle community, including supply staff, external support workers, volunteers and contractors has:

- Behaved in a way that has, or may have harmed a child/young person (**Harm Threshold**)
- Possibly committed a criminal offence related to a child/young person (**Criminal Threshold**)
- Behaved toward a child/young person in a way that indicates they would pose a risk of harm (**Suitability Threshold**)
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people (**Transferable Risk Threshold**)

What happens when an allegation is made against staff or a volunteer?

If an allegation is made against a member of Bedazzle staff or a volunteer which meets any of the above criteria, then the matter will be referred to the Chief Operations Officer, who is trained to take appropriate action. If the allegation concerns the Chief Operations Officer, this will be referred to the Director.

Bedazzle will comply fully with any investigations and may have to suspend the person(s) accused. This does not automatically mean that the accused is guilty; their suspension from work or their non-continuance as a volunteer will be on a 'without prejudice' basis. This action necessarily allows for the entire matter to be thoroughly investigated by the relevant authorities. Any subsequent action taken, or not, by Bedazzle will be determined by the outcomes of the investigation.

The Chief Operations Officer, DSL or Director may undertake initial inquiries to gather key information. They will assess whether the allegation meets the Local Authority Designated Officer (LADO) threshold; if it does, they will make a referral to LADO giving consideration to the Code of Conduct and Whistleblowing Policy. If necessary, they will complete a LADO referral within one working day. If the allegation does not meet the Harm Threshold for LADO, the Chief Operations Officer, DSL or Director will follow the Low-Level Concerns procedure.

The Role of the Case Manager for Allegations

At Bedazzle, the Case Manager for dealing with allegations will be a member of senior management. Their remit is to:

- Clarify facts of the concerns/allegation (not investigate) before contacting the LADO.
- Take part in Strategy Meetings to liaise with other partner agencies.
- Undertake internal planned inquiries/fact finding.
- Take part to review the progress of the case in which there is a Police officer investigation.
- Operate a thorough disciplinary process when appropriate.
- Ensure a properly managed conclusion and outcome to process.

12. Safer Recruitment Process

All Bedazzle staff are informed of new statutory requirements as they come into force. Bedazzle is committed to best practice in safer recruitment and as such will ensure that anyone who works or volunteers for us is appropriately vetted. This means all prospective employees and volunteers:

- Will be interviewed by a minimum of two members of Bedazzle staff members, with at least one having undertaken Safer Recruitment training
- May be asked to provide the names and contact details of two people (not relatives) who can provide a character reference. We will write in confidence to these referees which may be followed-up with a phone call.
- Will be required to apply for a DBS certificate specifically to work with Bedazzle before they begin employment or volunteering. The DBS check will reveal details of all convictions, cautions, reprimands and warnings held about the applicant on the Police National Computer.
- Will renew their DBS certificate as required (subject to latest legislation)

We consider that the work we undertake with children falls under the definition of 'regulated activity' through our provision of performing arts classes as well as bespoke tutor packages. This means that we have specific and important limitations on who we can employ; in particular that candidates are clearly informed that the positions are exempt from the [Rehabilitation of Offenders Act 1974](#). Candidates will be informed of the need to carry out enhanced DBS checks before posts can be confirmed. Where applications are rejected because of the information that has been disclosed, applicants have the right to know and to challenge incorrect information.

Bedazzle has a Safer Recruitment Policy and Checklist which is followed in all instances of recruitment, including volunteer recruitment. This policy is available in the staff folder on the G-Drive. All staff, as part of mandatory training sign once they have read and understood the:

- Safer recruitment policy

13. Record Keeping

Bedazzle will hold records confidentially, safely, securely and in line with our Data Protection Policy and Data Protection Privacy Notice.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records must include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached (including rationale), and the outcome.

Further detailed information about how to record a concern can be found in **APPENDIX 2**.

Concerns and referrals will be kept in a separate child protection file for each child in a secure location on the G-Drive. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual child will be retained for a reasonable period of time after they have left Bedazzle.

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded, and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records - *The Inquiry recommends that the UK government directs the Information Commissioner's Office to introduce a code of practice on retention of and access to records known to relate to child sexual abuse.*

The retention period for records known to relate to allegations or cases of child sexual abuse should be 75 years with appropriate review periods.

Receiving in and transferring pupil records to other education provision

If a child for whom the Bedazzle has, or has had, safeguarding concerns moves to another provision, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main service user file.

To allow the new provision to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving provision and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

Retention, archiving and destruction of records

Both paper based and electronic records are stored securely in line with GDPR procedures.

For records that are not transferred to another school, we have:

- a clear retention schedule as part of our Data Protection Policy
- a secure and appropriate system to archive with restricted access

14. Safeguarding Training and Development

All staff are taken through a comprehensive induction process in which safeguarding and child protection is a key element. No member of staff will engage with children alone until they have completed this process or the relevant training.

Each year staff undertake safeguarding training, as well as undertaking annual Prevent training. All staff who work with children are also required to read this document and sign a declaration to confirm they have read and understood the content.

APPENDIX 1: Types of Abuse

This section outlines the different types of abuse and some of the signs and symptoms which might alert you to a possible cause for concern.

There is often no clear dividing line between one type of abuse and another. A person may show signs and symptoms from one or all of the categories given below. In most cases, multiple issues will overlap.

Physical Abuse is a form of abuse which may involve:

- Hitting
- Shaking
- Throwing
- Poisoning
- Burning or scalding
- Drowning
- Suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness FII).

Possible signs of physical abuse may include:

- Unexplained injuries, or burns, particularly if they are recurrent
- Refusal to discuss injuries
- Improbable explanations for injuries
- Untreated injuries or lingering illness which is not attended to
- Acceptance of punishment which appears excessive
- Flinching when approached or touched
- Fear of staying with certain people or going to certain places
- Reluctance to get changed for sport or performance activities
- Fear of medical help
- Child or young person becoming aggressive or bullying others
- Child or young person running away from home
- Inappropriate clothing eg: being excessively covered in hot weather

Bruising is the most common injury. Some key facts about bruising are:

- Only 1 in 5 infants who are starting to walk have bruises.
- Most young children who walk independently have bruises.
- Young children tend to have more bruises in the summer months.
- Fractures are not always accompanied by bruising.
- The head is a common site for bruising caused by physical abuse.
- Clusters of bruises are a common feature of physical abuse.

Domestic Abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of domestic abuse,

regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background. Domestic Abuse can take place inside or outside of the home.

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of Domestic Abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Domestic Abuse can be, but is not limited to the following, signs to look out for and be professionally curious about:

- Controlling or coercive behaviour
- Violent or threatening behaviour
- Physical or sexual abuse
- Economic abuse
- Technology-facilitated abuse
- Psychological, emotional, or other abuse
- Stalking

Violence against woman and girls (VAWG) includes but not limited to harassment, stalking, rape, sexual assault, murder, honour-based abuse, coercive control and while men and boys also suffer from many of these forms of abuse, they disproportionately affect women. [Crime and Policing Bill: reducing violence against women and girls \(VAWG\) factsheet - GOV.UK](#)

Child-to-parent-abuse (CPA) or adolescent-to-parent abuse (APA) is any behaviour used by a child or young person to control, dominate or coerce parents. It can include emotional, verbal, physical or financial abuse and includes "coercive control," or in other words, the parent or other adult is compelled to change their own behaviours for fear of further abuse.

Emotional Abuse is 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 as far as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction.
- A child seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying).
- Causing a child to feel frightened or in danger.
- 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. It can be difficult to recognise emotional abuse, and children may not always realise

they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Possible signs of emotional abuse may include:

- Continual self-depreciation
- Very low self esteem, often with an inability to accept praise or trust adults
- Fear of new situations
- Inappropriate emotional responses to stressful situations
- Self harm or mutilation
- Compulsive stealing or scrounging
- Drug or solvent abuse
- 'Neurotic' behaviour such as obsessive rocking, thumb-sucking etc.
- Extreme passiveness or aggressiveness
- Social isolation
- Desperate attention seeking behaviour
- Eating problems, including over eating and lack of appetite
- Depression or withdrawal
- Over anxious – watchful, constantly looking for signals of trouble
- Selflessness to the point of sacrifice
- Sudden development of speech disorders
- No pride in achievement

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact: including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- 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
- Online abuse: sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children.

Possible signs of sexual abuse may include:

- Bruises, scratches, burns or bite marks on the body
- Scratches, abrasions or persistent infections in the genital or anal regions
- Pregnancy
- Sexual awareness inappropriate to the child or young person's age – shown, for example, in drawings, vocabulary, games, play and so on
- Frequent public masturbation
- Attempts to teach other children or young people about sexual activity
- Refusing to stay with certain people or go to certain places

- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends

Possible signs in older children and young adults may include:

- Promiscuity, prostitution, provocative sexual behaviour
- Self-injury, self-destructive behaviour, suicide attempts
- Eating disorders
- Tiredness, lethargy, listlessness
- Over-compliant behaviour
- Sleep disturbances
- Unexplained gifts of money
- Depression
- Changes in behaviour

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible signs of neglect may include:

- Constant hunger
- Loss of weight or consistently being underweight
- Poor personal hygiene
- Consistently unkempt, dirty appearance
- Inappropriate clothing
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing and scrounging
- Constant tiredness

Self-neglect entails neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It is also defined as the inability, intentional or unintentional, to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and wellbeing of the individual and sometimes to their community.

Indicators of self-neglect may include:

- Living in very unclean circumstances

- Poor self-care, leading to a decline in personal hygiene
- Poor nutrition
- Poorly healing sores
- Poorly maintained clothing
- Isolation
- Failure to take medication
- Hoarding
- Neglecting household maintenance or
- Portraying eccentric behaviour/lifestyles

Poor environments and personal hygiene may be a matter of personal or lifestyle choice or other issues, such as insufficient income.

Organisational or Institutional abuse is the mistreatment of people brought about by poor or inadequate care or support, or systematic poor practice that affects the whole care setting. It occurs when the individual's wishes and needs are sacrificed for the smooth running of a group, service or organisation.

In formal settings organisational or institutional abuse is more likely to occur where staff are:

- Inadequately trained
- Poorly supervised
- Not supported by management
- Have poor communication skills
- Part of a 'closed' culture, for example a care setting where new ideas, visitors, care management or other professional involvement is discouraged

Organisational or institutional abuse can involve more than one abuser, and there might also be a number of people experiencing the same abuse e.g. hate crime against particular groups or several family members mistreating a dependent other.

Examples of organisational abuse may include:

- Failure to respect or support a person or group's right to independence, dignity or choice
- Lack of person centred care planning or a ritualised care routine
- No flexibility in bed times or getting up or deliberately waking someone up
- Inappropriate confinement, restraint or restriction
- Lack of personal clothing or possessions
- Stark living areas, deprived environment or lack of stimulation
- Lack of choice in decoration or other aspects of the environment
- Lack of choice in food or menus or menu planning
- Unnecessary involvement in personal finances by staff or management
- Inappropriate use of nursing or medical procedures, e.g. using un-prescribed medication enemas or catheterization
- Inappropriate use of power or control

Indicators of organisational abuse may include:

- Treating adults like children
- Arbitrary decision making by staff group, service or organisation

- Strict, regimented or inflexible routines or schedules for daily activities such as meal times, bed / awakening times, bathing / washing, going to the toilet
- Lack of choice or options with food and drink, dress, possessions, daily and social activities
- Lack of privacy, dignity, choice or respect for people as individuals
- Unsafe or unhygienic environment
- Lack of provision for dress, diet or religious observance in accordance with an individual's belief or cultural background.

Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral, or social-emotional development. It covers situations of manipulation, misuse, abuse, victimisation, oppression, or ill-treatment.

There are several types of child exploitation, including, but not limited to:

Child Criminal Exploitation (CCE)

Child Criminal Exploitation (CCE) occurs where an individual or group takes advantage of a power imbalance to coerce, control, manipulate or deceive a child into criminal activity. This may involve the child being required to transport drugs or money ("county lines"), shoplifting, robbery or other criminal acts in exchange for money, gifts, status, protection or affection.

Possible indicators include:

- Frequently going missing from home or sessions
- Unexplained money, gifts, clothing or multiple mobile phones
- Association with older individuals or gangs
- Significant changes in behaviour
- Carrying weapons
- Reluctance to explain their whereabouts

Bullying (Including Cyberbullying)

Bullying is behaviour that is repeated, intentional and causes harm to another child or young person. It may be physical, verbal, emotional or online (cyberbullying).

Possible indicators include:

- Reluctance to attend sessions

- Unexplained injuries
- Sudden withdrawal or anxiety
- Low self-esteem
- Distress after using a phone or social media
- Changes in friendship groups

Bullying can be a safeguarding issue where there is a power imbalance and significant harm.

Forced Marriage

Forced marriage occurs when one or both individuals do not consent to the marriage and pressure, coercion, threats or abuse are used. It is different from an arranged marriage where both parties give full and free consent.

Possible indicators include:

- Sudden extended absence
- Talking about an upcoming marriage they seem unhappy about
- Withdrawal from activities
- Fear of family members
- Self-harm or signs of distress

Forced marriage is a criminal offence and must be treated as a safeguarding concern.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is a criminal offence and a form of child abuse. It involves procedures that intentionally alter or injure female genital organs for non-medical reasons.

Possible indicators include:

- Prolonged absence abroad
- Difficulty walking, sitting or standing
- Talking about a "special ceremony"
- Reluctance to undergo medical examination

- Frequent urinary or menstrual difficulties

Where a regulated professional discovers that FGM appears to have been carried out on a girl under 18, there is a mandatory duty to report this to the police.

Child Trafficking

Child trafficking involves the recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation. This can occur within the UK or across international borders.

Possible indicators include:

- Unexplained movement between locations
- Poor living conditions
- Lack of parental contact
- Inconsistent personal information
- Appearing frightened or under the control of others

APPENDIX 2: Writing a Safeguarding Report

When abuse is suspected, alleged or disclosed you should make a written record of your concerns and pass the information on to a Designated Safeguarding Lead as soon as possible. All reports need to be logged on MyConcern.

Some key points when writing a safeguarding report:

- Write down everything that has given you cause for concern and say why. Do this as soon as possible and always within 24 hours.
- Identify the source of the information. eg. 'Gemma the play scheme worker informed me that...' or 'I saw Fred on the playing field...'
- Use the exact words of the person telling you, not your own.
- Record what you saw, heard etc. and try to be specific eg. 'Kylie was crying and rocking' rather than 'Kylie was upset'.
- Stick to the facts. Only include opinion if you can justify it in some way. eg. 'Mary ran out of the playroom and hid in the toilets when her stepfather arrived. She appeared to be frightened.'
- If you can't access MyConcern, ensure you write down the following:
 - Your name
 - Your signature

- Child's name
- Child's date of birth
- Date of concern / incident
- Time of concern / incident
- Describe the concern / incident as factually and as fully as possible. Include who was involved, where it happened and exactly what happened. Remember to describe clearly any behavioural or physical signs you have observed and any actions you have taken. Ensure your notes are clear, they will undoubtedly be read by others in your absence. When you log in to MyConcern, as well as completing their form, attach your original notes to it. In some circumstances you may need to complete a body map to identify locations of injuries or concerns.