

<h1>Safeguarding Policy</h1>	
<p><b>Aims</b></p> <p><b>This is the Safeguarding and Children Protection Policy and Procedures of the Bridge SEN School</b></p> <ul style="list-style-type: none"> <li>• Providing protection for learners enrolled at The Bridge SEN School from abuse and maltreatment.</li> <li>• Preventing harm to the learner's health or development.</li> <li>• Identifying the names of responsible persons in the school and explaining the purpose of their role.</li> <li>• Describing what should be done if anyone in the school has a concern about the safety and welfare of a young person who attends the school.</li> <li>• Setting out expectations in respect of training.</li> <li>• Providing staff with guidance on procedures they should follow if they suspect any student may be experiencing or at risk of harm.</li> <li>• Setting out expectations of how to ensure young people are safeguarded when there is potential to come into contact with non-school staff.</li> <li>• Outlining how complaints against staff will be handled.</li> <li>• Clarifying how learners will be kept safe throughout the everyday life of the school.</li> <li>• Measures to follow to avoid making ourselves vulnerable to suspicion of any form of abuse.</li> </ul> <p><b>Regulatory framework</b></p> <p>The Bridge SEN School recognises its responsibility to safeguard the welfare of all members of staff and learners enrolled with us. We are committed to providing a safe and secure environment for young and vulnerable people, staff and visitors. This includes promoting a climate where young and vulnerable people and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others.</p> <p>We aim to safeguard and promote the welfare of young and vulnerable people by protecting them from maltreatment; preventing impairment of their health or development; ensuring that they develop in circumstances consistent with the provision of safe and effective care and taking action to enable all young people to have the best outcomes. The Bridge SEN School upholds the principle that every child and young person, irrespective of their ethnicity, gender, cultural background, sexual orientation, disability, faith, or religious belief, is entitled to equal protection from any form of harm or abuse. Furthermore, we acknowledge that children with disabilities and those with complex health needs may face an elevated risk of abuse due to their higher dependency levels, specific communication requirements, and/or other related factors, making them potentially more vulnerable.</p>	

Our Safeguarding policy draws upon duties conferred by the Children and Social Work Act 2017, Modern Slavery Act 2015, Domestic Abuse Act 2021, Children Acts 1989 and 2004, The Children and Families Act 2014, The Care Act 2014, Human Rights Act 1998, Safeguarding Vulnerable Groups Act 2006, S175 of the 2002 Education Act, The Education (Independent School Standards) Regulations 2014(for independent schools), and the guidance contained in "[Working Together to Safeguard Children](#)", the DfE's statutory guidance "[Keeping Children Safe in Education 2025](#)". Ofsted Guidance and procedures produced by the London Safeguarding Young person Board ([LSCB](#)) and the Southwark Safeguarding Children Board (SSCB). We also have regard to the advice contained in DfE's "[What to do if you're worried a child is being abused](#)" and "[Information Sharing -Advice for practitioners](#)".

The policy is applicable to all on, and off-site activities undertaken by learners whilst they are the responsibility of the School. We will ensure that all staff read at least Part one of DfE guidance "[Keeping Children Safe in Education 2025](#)" and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one.

### **Key School Contacts**

The Designated Safeguarding Lead of the school is:

**James Nuttal** ([james.nuttall@rightsupportmanagement.co.uk](mailto:james.nuttall@rightsupportmanagement.co.uk)) +44(0) 7802451640

The Deputy Designated Safeguarding Lead is:

**Lucia Han** ([admin2@thebridge-school.co.uk](mailto:admin2@thebridge-school.co.uk)) +44(0)7917972599

The Principal and Proprietor is:

**Edith Eneanya-Bonito** ([edithenanya-bonito@rightsupportmanagement.co.uk](mailto:edithenanya-bonito@rightsupportmanagement.co.uk)) +44(0) 7930561661

The Deputy Principal is: **Priya Parthiban** ([deputyprincipal@thebridge-school.co.uk](mailto:deputyprincipal@thebridge-school.co.uk)) +44(0)7481840133

The Chair of Governors is:

**Tracey Eldridge – Hinmers** ([teldridge-hinmers@wslaw.co.uk](mailto:teldridge-hinmers@wslaw.co.uk))

The Designated Safeguarding governor is:

**Lynn Nuttal** ([lynnn50@hotmail.com](mailto:lynnn50@hotmail.com)) +44(0)7427861058

### **Key External Contacts**

Croydon Local Authority Designated Officer (LADO) - **Jane Rowe**: ([jane.rowe@croydon.gov.uk](mailto:jane.rowe@croydon.gov.uk))  
Telephone: 020 8726 6000 ext. 24817 Mobile: 07716 092630

Email: [LADO@croydon.gov.uk](mailto:LADO@croydon.gov.uk)

LADO Service Manager: Steve Hall: [steve.hall@croydon.gov.uk](mailto:steve.hall@croydon.gov.uk)

### Publication and availability

This policy is published on the school website and a hard copy is available on request. A soft copy is distributed to all staff members on enrolment to the company.

### Definition

**Safeguarding and promoting the welfare of children** is defined in KCSIE as:

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

**The Designated Safeguarding Lead** is the person appointed to take lead responsibility for child protection issues in school. The person fulfilling this role must be a senior member of the school's leadership team, and the DSL role must be set out in the post holder's job description.

### Safeguarding principles

The Bridge SEN School will take reasonable steps to ensure that its learners and others who come into contact with The Bridge SEN School do not, as a result, come to harm or are exposed to danger.

Abuse is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm, abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Any safeguarding concern raised by any person will be taken seriously and action taken in accordance with the relevant Academy / School policies and procedures.

Safeguarding and promoting the welfare of young and vulnerable people is **everyone's** responsibility.

<p>Every learner should feel safe and protected from any form of abuse and neglect. The indicators of abuse and neglect and examples of specific safeguarding issues are set out in Appendix 1.</p> <p>We will implement all essential measures to uphold the rights of every Learner, safeguard their well-being, and minimize any potential opportunities for abuse.</p> <p>The Bridge SEN School is committed to acting in the best interests of the child, to safeguard and promote the welfare of children and young people. The Bridge SEN School requires everyone who comes into contact with children and their families to share this commitment.</p> <p>The Bridge SEN School will:</p> <ul style="list-style-type: none"><li>(a) follow the inter-agency procedures of the Southwark Safeguarding Partners;</li><li>(b) be alert to signs of abuse both in The Bridge SEN School and from outside and take steps to protect individuals from any form of abuse, whether from an adult or another child;</li><li>(c) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with the agreed child protection plan;</li><li>(d) design and operate procedures, which so far as possible, ensure that staff and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;</li><li>(e) prepare staff to identify children who may benefit from early help;</li><li>(f) be alert to the needs of learners with physical or mental health conditions, special educational needs or disabilities, where additional barriers can exist when detecting abuse or neglect;</li><li>(g) encourage a culture of listening to learners and taking account of their wishes and feelings in any measure put in place by The Bridge SEN School to protect them;</li><li>(h) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;</li><li>(i) assess the risk of learners being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;</li></ul>	
--	--

	<ul style="list-style-type: none"> <li>(j) identify learners who may be vulnerable to radicalisation, and know what to do when they are identified;</li> <li>(k) assess the risk of learners being drawn into county lines drug gangs, based on an understanding of the potential risk in the local area, identify learners who may be at such risk and know what to do when they are identified;</li> <li>(l) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual learners in The Bridge SEN School or in the local area.</li> </ul> <p><b>Contextual safeguarding</b></p> <ul style="list-style-type: none"> <li>(a) safeguarding incidents and / or behaviours can be associated with factors outside The Bridge SEN School and / or can occur between children outside the Academy / School.</li> <li>(b) All staff, including the DSL, should consider the context within such incidents and / or behaviours that occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and welfare.</li> <li>(c) Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.</li> </ul> <p>Staff may follow The Bridge SEN School's whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at The Bridge SEN School or potential failures by The Bridge SEN School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally.</p> <p><b>Safety Within the School</b></p> <p>No internal doors to classrooms will be locked whilst learners are present in these areas.</p> <p>Entry to school premises will be controlled by doors that are secured physically or by constant staff supervision or video surveillance. Our headteacher will use their professional judgment about the need to escort or supervise visitors such as children's relatives or other visitors attending a sports day. In the case of individuals visiting the school in a professional capacity e.g. educational psychologists, social workers etc., we will check their ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). They will be logged into and out of the premises and will be asked to wear their identity badges or be issued with school visitor badges. Unidentified visitors will</p>	
--	---	--

be challenged by staff or reported to the Headteacher or school office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the school or approaching learners will be reported to the Police by calling 101 or 999, depending on the circumstances and the urgency of the case so that if police stop these individuals, they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to LA's Schools Safeguarding Coordinator with a view to alert other local schools in liaison with the police and through appropriate systems.

Parents, carers or relatives may only take still or video photographic images of learners in school or on school-organised activities with the prior consent of the school and then only in designated areas. Images taken must be for private use only. Recording and/or photographing other than for private use would require the consent of the other parents whose children may be captured on film. Without this consent the Data Protection legislation would be breached. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

### **Remote education**

The Bridge SEN School understands the importance of keeping learners, students and staff safe whilst learning remotely. We will reinforce in our contacts with parents and carers the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they are asked to access and be clear who from our school (if anyone) their child is going to be interacting with online. We also note the DfE guidance [Safeguarding and remote education](#).

### **Online Safety**

The Bridge SEN School recognises the importance of recognising the dangers the internet can pose and ensuring our learners use online services safely. The four areas of online risk can be categorised into:

- Content: Harmful or inappropriate materials, misinformation/ disinformation and conspiracy theories
- Contact: Interacting with others including grooming by strangers posing as peers, peer pressure or exploitation
- Conduct: The behaviour of others online that can lead to harm: cyberbullying, sharing of inappropriate images, engaging with illegal online activities
- Commerce: Risks related to online transactions

### **Filtering and Monitoring**

<p>In accordance with the DfE's filtering and monitoring standards, the DSL and the DDSL will ensure that these standards are being met. Senior leaders will manage filtering and monitoring systems; review filtering and monitoring provision at least annually; block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet the learners and staff safeguarding needs. The Bridge SEN School acknowledges that the DfE's '<a href="#">plan technology for your school</a>', to self assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.</p> <p>In addition, The Bridge SEN School also acknowledges the DfE's '<a href="#">Generative AI product safety expectations</a>' The guidance explains how filtering and monitoring requirements apply to the use of generative AI in education and supports schools in using generative artificial intelligence safely.</p> <p><b>Children who are lesbian, gay, bisexual, or gender questioning</b></p> <p>The Bridge SEN School recognises that a child or a young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. Nevertheless, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual, (whether they are or not), can be just as vulnerable as children who are. Risks can be compounded where children lack trusted adults with whom they can be open. Our staff will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. Lesbian, gay, or bisexual inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to lesbian, gay, or bisexual children. The Bridge SEN School will have regard to appropriate DfE guidance concerning gender questioning children.</p> <p><b>Responsibilities</b></p> <p>Staff members should maintain an attitude of "<b>it could happen here</b>" where safeguarding is concerned. When concerned about the welfare of a learner, staff members should always act in the <b>best interests</b> of the learner.</p> <p>All staff members have a duty to:</p> <ul style="list-style-type: none"><li>• report any concerns they may have about the safety and/or wellbeing of learners;</li></ul>	
--	--

- report any concerns they may have about the safety and/or wellbeing of other persons associated with the Academy/School;
- report any safeguarding concerns about staff or anyone else associated with The Bridge SEN School

The procedures for doing so are set out below. If staff are unsure about the process, they should not hesitate to speak to the DSL, senior leadership team or directly to children's services or police in their absence for guidance.

### **Staff Code of Conduct**

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. The Teachers' Standards 2012 state that all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. We will endeavour to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Learners will be treated with respect and dignity and no punishment, detention, restraint, sanctions, or rewards are allowed outside of those detailed in the school's Behaviour Management Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a learner for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents. Any physical restraint used will comply with DfE guidance "[Use of reasonable force in schools](#)".

Except in cases of emergency, first aid will only be administered by qualified First Aiders. If it is necessary for the child to remove clothing for first aid treatment, there will, wherever possible, be another adult present. If a child needs help with toileting, nappy changing or washing after soiling themselves, another adult should be present or within earshot. All first aid treatment and non-routine changes, or personal care will be recorded and shared with parents/carers at the earliest opportunity.

Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents and health authority.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Other than in formal teaching situations; for example, during musical instrument tuition, the door to the room in which the 1:1 coaching, counseling or meeting is taking place should be left open. Where this is not practicable because of the need for confidentiality, another member of staff will be asked to maintain a presence nearby and a record will be kept of the circumstances of the

meeting. All rooms that are used for the teaching or counseling of pupils will have clear and unobstructed glass panels in the doors.

School staff should be alert to behaviours that may cause '**low-level' concerns** such as 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, humiliating pupils (see below about what a 'low-level' concern is and how to share these concerns).

Staff will only use the school's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Head and Governing Body. Staff will only use the approved school email, school learning platform or other school approved communication systems with pupils or parents/carers and only communicate with them on appropriate school business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers. Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.

We note the non-statutory [Guidance for Safer Working Practice for professionals working in education settings](#) published by the [Safer Recruitment Consortium](#).

#### **What to do if staff have a concern about a pupil**

A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989. If staff have **any concern** about a pupil's welfare, action should be taken **immediately**.

The member of staff must complete a welfare concern form (appendix 2) and report the concern to the **DSL** or the **DDSL** in the DSL's absence.

The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy. See Appendix 3 for guidance about what to do when receiving a disclosure and recording a concern.

If the concern involves an allegation against staff this must be reported in accordance with the procedures set out in Appendix 3.

**Teachers must report known cases of female genital mutilation (FGM) to the police. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.**

<p><b>What if the DSL is unavailable?</b></p> <p>The DSL or DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns outside of Academy/ School hours.</p> <p>If in exceptional circumstances the DSL and DDSL are unavailable, which may occur outside term time or school hours, staff must not delay in taking action. Staff should speak to their line manager or a member of the senior leadership team and /or advice should be taken from children's services. The contact details are set out at the front of this policy.</p> <p>Where a child is suffering, or is likely to suffer significant harm, a referral to children's services should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and/or the police in these circumstances.</p> <p>Any action taken should be shared with the DSL or DDSL, or a member of the senior leadership team, as soon as practically possible.</p> <p><b>Action by the DSL</b></p> <p>On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Southwark Safeguarding Partners procedures and referral threshold document. Such action may include:</p> <ul style="list-style-type: none"> <li>(a) managing any support for the learner internally via the school's own pastoral support processes – seeking advice from the statutory services where required;</li> <li>(b) an early help assessment (see section 11 below); or</li> <li>(c) a referral for statutory services (see section 12 below).</li> </ul> <p>The views of the child or the advocate/guardian will be taken into account when considering the appropriate course of action but will not be determinative.</p> <p>If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving. Staff will record the concern on a Welfare Concern Form (appendix 2). The Bridge School will coordinate with the local safeguarding team from Southwark Council wherever it is appropriate and follow their guidance in investigations, where an investigation is deemed necessary, and/or on further actions required.</p>	
--	--

	<p><b>Early help</b></p> <p>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. The Bridge SEN School understands that providing early help is more effective in promoting the welfare of children than reacting later.</p> <p>The Bridge SEN School's safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those learners who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:</p> <ul style="list-style-type: none"><li>• is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups;</li><li>• is frequently missing /goes missing from care or home;</li><li>• is misusing drugs or alcohol;</li><li>• is at risk of modern slavery, trafficking or exploitation;</li><li>• is in a family circumstance presenting challenges for the child, such as substance abuse, mental health problems or domestic abuse;</li><li>• is looked after or has returned home to their family from care;</li><li>• is showing early signs of abuse / neglect;</li><li>• is at risk of being radicalised or exploited;</li><li>• is a privately fostered child.</li><li>• If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases, staff may be required to take a lead role.</li></ul> <p>The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse or does not appear to be improving.</p>	
--	---	--

### **Making a referral**

**Where a child is suffering, or is likely to suffer significant harm, a referral to the children's social care (and if appropriate the police) should be made immediately.** The contact details for children' social care is set out at the front of this policy.

### **Statutory assessments**

Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- (a) **Children in need:** A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.
- (b) **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

Staff required to make a direct referral may find helpful the flowchart set out on page 22 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.

Staff will need to have access to certain information about the child and safeguarding concern in order to make a referral. In general terms, this information will comprise:

- personal details of the child including the child's developmental needs;

- detailed information about the concern;

	<p>information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.</p> <p>If the referral is made by telephone, this should be followed up in writing.</p> <p>If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.</p> <p>Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received the DSL (or the person that made the referral) should contact children's social care again.</p> <p>Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves. [<i>* Insert additional details about local escalation procedures.</i>]</p> <p><b>Allegations about Learners – child on child abuse</b></p> <p>Allegations against learners should be reported in accordance with the procedures set out in this policy (see section 8 above.) If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be considered but will not be determinative.</p> <p>A learner against whom an allegation of abuse has been made may be suspended from the School as a neutral measure during the investigation and the School's policy on behaviour, discipline and sanctions will apply. The Bridge SEN School will take advice from children's social care and /or the police, as appropriate, on when and how to inform the learner and his/her parents / carers about the allegations and how investigation of such allegations will be conducted. The Bridge SEN School will carry out risk assessments and take all appropriate action to ensure the safety and welfare and continued education of all learners including the learner or learners accused of the abuse.</p> <p>If it is necessary for a learner to be interviewed by the police in relation to allegations of abuse, The Bridge SEN School will ensure that, subject to the advice of relevant agencies, the learner's parents/carers are informed as soon as possible, and that the learner is supported during the interview by an appropriate adult.</p> <p>All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. It is recognized that child on child abuse is harmful to both the perpetrator and the</p>	
--	--	--

victim. Therefore, appropriate support will be provided to all learners involved, including support from external services as necessary.

If from the information that school gathers it is believed that any learner is at risk of significant harm, a safeguarding referral to Local Authorities will be made immediately (in situations where a crime has been committed the police will also be involved). This action, in most circumstances, will be undertaken by the Designated Safeguarding Lead but in the event of their absence the referral can be made by another member of staff. If this is the case, once the Local Authority has been contacted and made a decision on what will happen next then the school will be informed of the next steps. If the Local Authority and the police intend to pursue this further, they may ask to interview the learners or the staff in school or they may ask for parents to come to school to be spoken to also. It is important for school to be prepared for every situation and the potential time it may take. It may also be that Local Authority feels that it does not meet their criteria in which case school/DSL may challenge that decision, with that individual or their line manager. If in discussion however, the School agrees with the decision, the school may then inform parents.

#### **What to do if staff have a concern about someone's welfare**

- (a) Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.
- (b) In the absence of an express procedure about reporting, they should report such concerns to their line manager in the first instance.

#### **Allegations against staff**

The Bridge SEN School has procedures for dealing with allegations against staff:

The procedures in this policy apply to staff who pose a risk of harm to children and aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 3 and follow Part 4 of KCSIE.

The Bridge SEN School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of The Bridge SEN School in relation to contact with learners, parents/carers, colleagues and any other person who comes into contact with

<p>the Academy/School. This guidance is contained in [* the Employment Manual] and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with learners.</p> <p><b>Informing parents/carers</b></p> <p>Parents/carers will be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and /or the learner before discussing details with parents/carers.</p> <p>In all cases, the DSL will be guided by the Southwark Safeguarding Partners referral threshold document.</p> <p>See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.</p> <p><b>Training</b></p> <p>The Bridge SEN School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.</p> <p>The level and frequency of training depends on the role of the individual staff member.</p> <p>The Bridge SEN School maintains written records of all staff training.</p> <p>All training will be carried out in accordance with the guidance of the local authority where possible. In partnership with the local authority, the school receives regular announcements about changes in safeguarding legislation or related training or opportunities for further education.</p> <p><b>Safe Recruiting</b></p> <p>The Bridge SEN School believes in recruiting staff that are suitable to work with young people in the school. We will establish a consistent and comprehensive process for secure recruitment to guarantee that all recruited individuals are suitable. This process will involve implementing procedures for safe recruitment and selection that are designed to deter, reject, or identify individuals who may pose a risk of harm to children or are otherwise unsuitable to work with them.</p> <p>Advertisements for positions in the school define the specifications of the role including the safeguarding requirements. Candidates are asked to provide:</p>	
---	--

	<ul style="list-style-type: none"> <li>● personal details</li> <li>● details of their present or last employment</li> <li>● full employment history</li> <li>● qualifications</li> <li>● details of two professional references.</li> </ul> <p>Candidates are shortlisted and then asked to produce a self-declaration of their criminal record or information that would make them unsuitable to work with children. References should confirm the candidate's suitability to work with children and so include information of any substantiated safeguarding allegations.</p> <p>Pre-appointment vetting checks for candidates must include an enhanced DBS check, a separate children's barred list check, proof of eligibility to work in the UK and if they have lived and worked abroad for a period of longer than three months within the last five years provide an appropriate police check for that country as soon as is convenient (the school recognises such overseas checks can sometimes take a considerable time to be completed). All qualifications must be verified. If the candidate is taking up a management position, a section 128 check must be completed. Any staff member undertaking a teaching position must be confirmed to not be on the teacher's prohibition list.</p> <p>When the school uses contractors, the Safeguarding requirements should be set out between the individual/organisation and the school. The contractor must be or have been subject to the appropriate level of DBS checks.</p> <p>Any staff with delayed suitability checks may begin work at The Bridge SEN School at the discretion of the Academic Manager and the Principal but will not be allowed to teach a group or individual Learners without supervision until the suitability checks have been completed. If at any time the new employee demonstrates any behaviour that is unsuitable, their offer of employment will be withdrawn. Any staff member who has been unable to complete the suitability checks according to The Bridge SEN School Recruitment policy within two months may have their offer of employment withdrawn. In the case of the new staff member being unsuitable to continue teaching either on the day or permanently, then the lessons will be covered by the Academic Manager or administrative assistant until further notice. If either the Academic Manager or administrative assistant are not available, then a teacher who has successfully completed their suitability check will be asked to cover the class.</p> <p>The Bridge SEN School maintains a single central register of appointments for all staff.</p> <p><b>Induction</b></p> <p>All staff, including temporary staff and volunteers, will be provided with induction training that includes:</p> <p>(a) this policy;</p>	
--	--	--

	<ul style="list-style-type: none"> <li>(b) the role, identity and contact details of the DSL and his/her deputy;</li> <li>(c) the Behaviour Policy for learners;</li> <li>(d) the Staff Code of Conduct, Staff Social Media Policy and Acceptable Use Policy;</li> <li>(e) the safeguarding response to children who go missing from education;</li> <li>(f) the Academy/School's approach to online safety;</li> <li>(g) safeguarding training in accordance with [* name of county/borough] Safeguarding Partners procedures including guidance on managing a report of peer-on-peer harmful sexual behaviour;</li> <li>(h) a copy of Part 1, and where appropriate, Annex A of KCSIE; and</li> <li>(i) appropriate Prevent training</li> </ul> <p><b>Safeguarding Training</b></p> <p>All staff including the Principal will receive a copy of this policy and Part 1 and where appropriate, Annex A of KCSIE, and will be required to confirm that they have read and understand these.</p> <p>The Principal and all staff members will undertake appropriate safeguarding training which will be updated every 2 years. In addition, all staff members will receive safeguarding and child protection updates on a regular basis and at least annually.</p> <p>Staff development training will also include training on online safety, searching learners for prohibited and banned items, and Prevent duty training assessed as appropriate by the Academy/School.</p> <p>Additionally, the Bridge SEN School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalization, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyberbullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe. For more information about the support of looked after children please see Appendix 5.</p> <p>All Governors receive safeguarding training on induction. The Nominated Safeguarding Trustee/Governor and the Chair of the Trust Board/Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.</p>	
--	--	--

<p>The Bridge SEN School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings, and professional development reviews. This includes information on how staff can report concerns occurring out of hours/out of term time.</p> <p><b>Designated Safeguarding Lead (DSL)</b></p> <p>The DSL and Deputy DSL will undertake safeguarding training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years.</p> <p>In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role.</p> <p><b>Teaching learners about safeguarding</b></p> <p>The Bridge SEN School teaches learners about safeguarding through the curriculum and RSE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.</p> <p>Learners are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through RSE education appropriate to their age and stage of development.</p> <p>Learners are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The Bridge SEN School's concerns and complaints procedure for learner's parents or guardians sets out in writing what they should do if they have a worry or complaint.</p> <p>The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial/pastoral activities. The Bridge SEN School has appropriate filters and monitoring systems in place and is mindful that this should not lead to unnecessary restrictions on learning.</p> <p><b>Risk Assessment</b></p> <p>Where a concern about a learner's welfare is identified, the risks to that learner's welfare will be assessed and appropriate action taken to reduce the risks identified. Please see the school's Risk Assessment Policy for full details of how and when Risk assessments are carried out.</p>	
---	--

The format of risk assessment may vary and may be included as part of The Bridge SEN School's overall response to a welfare issue, including the use of individual learner welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, The Bridge SEN School's approach to promoting learner welfare will be systematic and learner focused.

The Principal has overall responsibility for ensuring that matters which affect learner welfare are adequately risked assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.

Day-to-day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

### **Monitoring and Review**

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Proprietor as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the Academy/School's safeguarding arrangements.

Any safeguarding incidents at The Bridge SEN School will be followed up by a review of these procedures by the DSL and a report made to the Proprietor. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the Academy/School's procedures. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

The Proprietor will undertake an annual review of this policy and the Academy/School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working.

The DSL will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the Proprietor. The written report should address how The Bridge SEN School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in The Bridge SEN School and how these have been handled; and the contribution The Bridge SEN School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Proprietor should also consider independent corroboration, such as:

- inspection of records or feedback from external agencies including the Designated Officer(s);
- reports of Ofsted inspections;
- the outcome of any relevant parental complaints; and
- press reports.

	<p>The Proprietor will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Proprietor will be made.</p> <p><b>Annual Review</b></p> <p>Safeguarding guidelines and practices are reviewed annually each September when the latest edition of Keeping Children Safe In Education is published. The review will be in accordance with all statutory and best practice guidelines and will include a review of the effectiveness of procedures and their implementation, making recommendations for any required updating or improvement.</p>	
	Updated September 2025	Next Review Date: September 2026

## Appendix 1 – Indicators of Abuse

### 1 Types of abuse

- 1.1 Part 1 of KCSIE defines the following indicators of abuse and neglect, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.
- 1.2 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- 1.3 **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.
- 1.4 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on a child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1.5 **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 sexually in appropriate ways, or grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children is a specific safeguarding issue in education.
- 1.6 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure

access to appropriate medical care or treatment. It may include neglect of, or unresponsiveness to, a child's basic emotional needs.

## 2 Signs of abuse

- 2.1 Possible signs of abuse include, but are not limited to:
  - 2.1.1 the learner says he/she has been abused or asks a question or makes a comment which gives rise to that inference;
  - 2.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
  - 2.1.3 the pupil's behaviour stands out from the group as either extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
  - 2.1.4 the learner asks to drop subjects with particular teacher and seems reluctant to discuss the reasons;
  - 2.1.5 the pupil's development is delayed, the learner loses or gains weight or there is a deterioration in the pupil's general well-being;
  - 2.1.6 the learning appears neglected, e.g. dirty, hungry, inadequately clothed;
  - 2.1.7 the learner is reluctant to go home, or has been openly rejected by his/her parents or carers; and
  - 2.1.8 inappropriate behaviour displayed by other members of staff, or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 2.2 The Southwark Safeguarding Partners can provide advice on the signs of abuse and the DfE advice [What to do if you're worried a child is being abused \(March 2015\)](#) provides advice in identifying child abuse. The [NSPCC website](#) is also a good source of information and advice.

## 3 Specific safeguarding issues

- 3.1 Statutory guidance acknowledges the following as specific safeguarding issues:
  - 3.1.1 children and the court system;
  - 3.1.2 children missing from education (see section 3.3 below);
  - 3.1.3 children with family members in prison;
  - 3.1.4 child sexual exploitation (see section 3.4 below);
  - 3.1.5 child criminal exploitation: county lines (see section 3.5 below);
  - 3.1.6 domestic abuse;
  - 3.1.7 homelessness;

- 3.1.8 so-called “honour-based” violence (see section 3.6 below);
- 3.1.9 preventing radicalisation (see section 3.7 below);
- 3.1.10 child on child abuse (see section 3.8 below);
- 3.1.11 sexual violence and sexual harassment between children in schools and colleges (see section 3.9 below).

3.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE 2022. Staff should be particularly aware of the safeguarding issues set out below.

**3.3 Children missing education.**

- 3.3.1 Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Academy/School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a learner from The Bridge SEN School gives rise to a concern about his/her welfare.
- 3.3.2 Where reasonably possible The Bridge SEN School will hold more than one emergency contact for each pupil.
- 3.3.3 The Bridge SEN School will inform the local authority of any learner who is going to be added or deleted from the Academy/School’s admission register at non-standard transition points in accordance with the Education (Learner Registration) (England) Regulations 2006 (as amended).
- 3.3.4 This will assist the local authority to:
  - (a) fulfill its duty to identify children of compulsory school age who are missing from education; and
  - (b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

3.3.5 The Bridge SEN School shall inform the local authority of any learner who:

- (a) fails to attend The Bridge SEN School regularly; or
- (b) has been absent without the Academy/School’s permission for a continuous period of ten school days or more, at such intervals as are agreed between The Bridge SEN School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

**3.4 Child sexual exploitation (CSE)**

- 3.4.1 Child sexual exploitation is a form of sexual abuse. It occurs when 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 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.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### **3.5 Child criminal exploitation: county lines**

- 3.5.1 Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.
- 3.5.2 Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.
- 3.5.3 County lines exploitation can:
  - (a) affect any child or young person under the age of 18;
  - (b) can still be exploitation even if the activity appears consensual;
  - (c) can involve force and/or enticement-based methods of compliance and is often accompanied by threats of violence;
  - (d) can be perpetrated by individuals or groups, males or females, and young people or adults; and
  - (e) is typified by some form of power imbalance in favour of those perpetrating the exploitation. The power imbalance can be due to age, gender, cognitive ability, physical strength, status and access to economic or other resources.

- 3.5.4 If The Bridge SEN School has any concern that a learner may be involved in such activity a referral to the National Referral Mechanism<sup>1</sup> should always be considered. Staff should speak to the DSL before any action is taken.

- 3.5.5 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### **3.6 Honour-based violence**

- 3.6.1 All forms of so-called honour-based violence are regarded as abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.
- 3.6.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### **3.6.3 Female Genital Mutilation (FGM)**

---

<sup>1</sup> [Home Office – Modern slavery victims referral and assessment forms](#)

- (a) FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- (b) There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM \(HM Government, October 2018\)](#) (pages 59-61 focus on the role of schools).
- (c) All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining learners. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.
- (d) If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the [Home Office guidance Mandatory reporting of female genital mutilation – procedural information \(January 2020\)](#) for further details about the duty.

#### 3.6.4 **Forced Marriage**

- (a) Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- (b) Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: handling case of forced marriage](#) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk) for advice and information.

#### 3.7 **Radicalisation and the Prevent duty**

- 3.7.1 The Bridge SEN School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 3.7.2 The Bridge SEN School aims to build learners' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The Bridge SEN School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated

with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

3.7.3 The Bridge SEN School has adopted the government's definitions for the purposes of compliance with the Prevent duty:

**Extremism:** *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas".*

**Radicalisation:** *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups".*

3.7.4 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Background factors may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

3.7.5 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Academy/School staff should use their professional judgment in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a referral to the Channel programme, having consulted [Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government,2020\)](#).

3.7.6 The [DfE and Home Office's briefing note The use of social media for online radicalisation \(July 2015\)](#) includes information on how social media is used to radicalise young people and guidance on protecting learners at risk.

### 3.8 Child on child abuse

3.8.1 The conduct of learners towards each other will, in most instances, be covered by the Academy/School's behaviour and discipline policies. However, some behaviour by one learner towards another may be of such a nature that safeguarding concerns are raised.

3.8.2 Safeguarding issues can manifest themselves via child-on-child abuse. This includes but is not limited to:

- (a) bullying (including cyber-bullying);
- (b) physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- (c) harmful sexual behaviour (see 3.8.4 below);
- (d) sexting (also known as youth produced sexual imagery); and
- (e) initiation / hazing type violence and rituals.

3.8.3 Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. The Bridge SEN School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental

damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and The Bridge SEN School recognises the gendered nature such behaviour can take. See also 3.9 below. Harmful sexual behaviour like all peer-on-peer abuse, is never acceptable and will be taken seriously.

3.8.4 The Bridge SEN School recognises that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff will endeavor to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory *Relationships Education, Relationship and Sex Education and Health Education* curriculum. We will work with appropriate agencies to counter homophobic, biphobic and transphobic bullying and abuse and to provide support to LGBT children.

3.8.5 The Bridge SEN School takes steps to minimise the risk of all types of child on child abuse. The Bridge SEN School has robust anti-bullying procedures in place (see the Academy/School's anti-bullying policy) and learners are taught at all stages of The Bridge SEN School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect learners identified as being at risk including the particular vulnerabilities of those with special educational needs or disability (see the Academy/School's [\* risk assessment policy for learner welfare]).

3.8.6 Abusive behaviour by learners must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

### 3.9 **Sexual violence and sexual harassment between children**

3.9.1 Sexual violence and sexual harassment can occur between two or more children of any age or sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

3.9.2 Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The Bridge SEN School will respond to allegations seriously and all victims will be offered appropriate support.

3.9.3 The Bridge SEN School is aware of the importance of:

- (a) making it clear to learners that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- (b) not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

(c) challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

3.9.4 References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

3.9.5 References to **sexual harassment** mean “unwanted conduct of a sexual nature” that can occur online and offline. In the context of child-on-child sexual harassment, it is likely to: violate a child’s dignity; and /or make them feel intimidated, degraded or humiliated; and /or create a hostile, offensive or sexualised environment.

3.9.6 The DfE guidance [Sexual violence and sexual harassment between children in schools and colleges](#) provides further detailed guidance.

3.10 **Sexting**

3.10.1 “Sexting” means the taking and sending or posting of images or videos of a sexual or indecent nature.

3.10.2 The Bridge SEN School treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.

3.10.3 Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring to any incident of sexting, members of staff should describe the content of the images as reported to them.

3.10.4 The DSL may in exceptional circumstances view images with the prior approval of the Principal and only where:

- (a) it is the only way to make a decision whether to involve other agencies; as there is insufficient information available as to its content;
- (b) it is necessary to report the image to a website or agency to have it taken down; or
- (c) a learner has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

3.10.5 Where viewing an image is unavoidable:

- (a) viewing should take place on Academy/School premises wherever possible;
- (b) the image should be viewed by a person of the same sex as the person alleged to be shown in the image, where this is known.
- (c) a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- (d) full details of the viewing must be recorded in the Academy/School’s safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;

- (e) any member of staff who views an indecent image should be given appropriate support.

3.10.6 If any devices need to be confiscated, whether in order to view the image(s) or to pass evidence to the appropriate authority, they should be turned off and locked away securely until they are required.

3.10.7 If an electronic device that is prohibited by The Bridge SEN School rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

3.10.8 If external agencies do not need to be involved, The Bridge SEN School must consider the deletion of any images. Learners should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

3.10.9 If images have been shared online and cannot now be deleted by the person who shared them, The Bridge SEN School should consider reporting the images to the relevant web host or service provider, if an option is provided, or contacting the Internet Watch Foundation or ChildLine if the website does not provide this option.

3.10.10 Where a learner receives unwanted images, The Bridge SEN School should advise the learner and his/her parents/carers of options that may be available to block the sender or to change the pupil's mobile number or email address.

3.10.11 The UK Council for Child Internet Safety's advice note [Sexting in schools and colleges: responding to incidents and safeguarding young people \(December 2020\)](#) contains details of support agencies and provides further information for schools on how to respond to incidents of sexting.

3.10.12 The College of Policing has also produced a briefing note [Police action in response to youth produced sexual imagery \("Sexting"\) \(November 2016\)](#) which provides information on how police forces treat instances of sexting by young persons.

#### **4 Special educational needs and disabilities**

4.1 The Bridge SEN School welcomes learners with special educational needs and disabilities and will do all that is reasonable to ensure that the Academy/School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the Academy/School's policies on special educational needs and disability.

4.2 Additional barriers can exist when detecting the abuse or neglect of learners with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The Bridge SEN School is mindful that:

4.2.1 assumptions that are indicators of possible abuse such as behaviour, mood, and injury relate to the pupil's special educational need or disability without further exploration;

- 4.2.2 learners with a special educational need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and
- 4.2.3 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

## **5      Looked after children and previously looked after children**

- 5.1 The Proprietor ensures that staff have the skills, knowledge and understanding to keep looked-after children safe and the information they need in relation to a child's looked-after legal status, for example:
  - 5.1.1 whether they are looked after under voluntary arrangements with consent of parents/carers or on an interim or full care order;
  - 5.1.2 contact arrangements with birth parents or those with parental responsibility;
  - 5.1.3 information about a child's care arrangements and the level of authority delegated to the carer by the authority looking after him/her.
- 5.2 The DSL maintains these details, including contact details of the child's allocated social worker.

## **6      Care leavers**

- 6.1 The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

## Appendix 2

### Welfare Concern form

To be completed by any member of staff who witnessed or was informed about the alleged or suspected abuse or neglect.

Name of student:	
DOB of student:	
Date of report:	
Details of concern:	
Follow up action:	
Notes:	
Compiled by:	
Date:	

Signed:

## **Appendix 3**

### **Concerns about a child – guidance for staff**

#### **1 Receiving a concern**

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e., a question that suggests its own answer.
- 1.3 Reassure the learner but do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.
- 1.4 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.5 Pass on the record when reporting the concern in accordance with this policy.

#### **2 Recording a concern**

- 2.1 Staff must record all concerns in writing.
- 2.2 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:
  - 2.2.1 the pupil's details: name; date of birth; address and family details;
  - 2.2.2 date and time of event / concern / conversation;
  - 2.2.3 the action taken and by whom;
  - 2.2.4 the name and position of the person making the record.
- 2.3 The Bridge SEN School has a pro forma record which should be completed and passed on when reporting the matter in accordance with this policy. This pro forma is available in the office, school drive and library. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

#### **3 Receiving a report of harmful sexual behaviour**

- 3.1 Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 of KCSIE. This includes the following advice:

- 3.1.1 only record the facts as the child presents them;
- 3.1.2 where the report includes an online element, do not view or forward illegal images of a child. See paragraph 3.10 of Appendix 1 above and the UK Council for Child Internet Safety's advice note [Sexting in schools and colleges: responding to incidents and safeguarding young people \(December 2020\)](#) for advice about what to do when viewing an image is unavoidable;
- 3.1.3 manage reports with another member of staff present, preferably DSL or DDSL, if possible.
- 3.1.4 inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

#### **4 Use of reasonable force**

- 4.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard learners. “Reasonable” in these circumstances means using no more force than is needed.
- 4.2 Staff should refer to the School's Behaviour and Discipline Policy and the staff code of conduct for more detailed guidance about the use of reasonable force.

## **Appendix 4**

### **Dealing with allegations against staff**

#### **1 The Academy/School's procedures**

- 1.1 The Academy/School's procedures for dealing with allegations made against staff will be used where a member of staff has:
  - 1.1.1 behaved in a way that has harmed a child, or may have harmed a child;
  - 1.1.2 possibly committed a criminal offence against or related to a child; or
  - 1.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children
- 1.2 Any allegations not meeting this criteria will be dealt with in accordance with the London Borough of Southwark Safeguarding Partners procedures. Advice from the Designated Officer will be sought in borderline cases.
- 1.3 All such allegations must be dealt with as a priority without delay.
- 1.4 The local authority has a designated particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The Designated Officer(s) will be informed immediately and in any event within one working day of all allegations that come to the Academy/School's attention and appear to meet the criteria in paragraph 1.1 above.
- 1.5 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

#### **2 Reporting an allegation**

- 2.1 Where an allegation or complaint is made against any member of staff (other than the Principal), including the DSL, the matter should be reported immediately to the Principal. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Principal will consult with the DSL.
- 2.2 Where an allegation or complaint is made against the Principal, the matter should be reported immediately to the Chair of Governors or the Nominated Safeguarding Governor, without first notifying the Principal. The allegation will be discussed immediately with the Designated Officer(s) before further action is

taken. The Chair of Governors will consult the Nominated Safeguarding Governor, and vice versa.

- 2.3 Where an allegation is made against any Governor, the matter should be reported immediately to the Chair or the Nominated Safeguarding Governor. If either the Chair or the Nominated Safeguarding Governor are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Chair will consult the Nominated Safeguarding Governor, and vice versa.
- 2.4 If it is not possible to report to the Principal or Chair of Governors or Nominated Safeguarding Governor in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Principal, or where appropriate the Chair of Governors and the Nominated Safeguarding Governor.
- 2.5 The person taking action in accordance with the procedures in this Appendix is known as the **Case Manager**.

### **3 Disclosure of information**

- 3.1 The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.
- 3.2 The parents or carers of the child/children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence, data protection and the advice of external agencies.
- 3.3 Where the Designated Officer(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

### **4 Further action to be taken by the School**

- 4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The Bridge SEN School will take action in accordance with Part 4 of KCSIE and the School's employment procedures.

### **5 Ceasing to use staff**

- 5.1 If The Bridge SEN School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used and a referral to the Disclosure and Barring Service (**DBS**) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the Academy/School, with a report being presented to the Proprietor without delay. The Bridge SEN School may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.

- 5.2 If a member of staff tenders his / her resignation, or ceases to provide his / her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by The Bridge SEN School in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.
- 5.3 Separate consideration will be given as to whether a referral to the Teaching Regulation Authority (**TRA**) should be made where a teacher has been dismissed, or would have been dismissed had he / she not resigned because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.

## 6 **Malicious allegations**

- 6.1 Where an allegation by a learner is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.
- 6.2 Whether or not the person making the allegation is a learner or a parent/carer (or other member of the public), The Bridge SEN School reserves the right to contact the police to determine whether any action might be appropriate.

## 7 **Record keeping**

- 7.1 Details of all allegations found to be malicious will be removed from personnel records.
- 7.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.
- 7.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.
- 7.4 The Bridge SEN School will retain all safeguarding records and relevant personnel records for so long as reasonably required.

## **Appendix 5**

Education for looked after children

### **Ensuring stability in education**

Local Authorities have a responsibility to secure a suitable care placement for looked after children in their area. In discharging this duty, the child's social worker must ensure that all efforts are made to minimise disruption to the child's education. This means that, where possible, the Local Authority should arrange a care placement which enables the child to continue in their existing educational placement. This is contained in [Regulation 10 Care Planning, Placement and Case Review \(England\) Regulations 2010.](#)

### **The personal education plan (PEP)**

All looked after children have a care plan. A PEP is a statutory requirement to ensure that a record is maintained regarding the child's educational progress and thus it forms an integral part of the child's overall care plan. The PEP should detail what needs to happen in order for the looked after child to fulfill their potential. The Local Authority are under a duty to ensure that the PEP fully reflects the educational needs of the child, remains relevant to the child's age, ability and aptitude, and is implemented effectively.

### **The content of a PEP**

The statutory guidance on [promoting the education of looked after children](#) requires that a range of educational and developmental needs are covered in a PEP. These include:

access to a nursery or other high quality early years provision that is appropriate to the child's age and meets their identified developmental needs

on-going catch-up support for those who have fallen behind with school work

provision of immediate suitable education where a child is not in school

transition support needs where needed, such as when a child begins to attend a new school or returns to school; or when a child has a plan for permanence and may change schools as part of that plan;

support needed to help the child realise their short and long-term academic achievements and aspirations. This includes:

support to achieve expected levels of progress for the relevant national curriculum key stage and to complete an appropriate range of approved qualifications

careers advice and guidance and financial information about further and higher education, training and employment

out-of-school hours learning activities, study support and leisure interests

school attendance and, where appropriate, behaviour support

### **Review of the PEP**

A PEP must be reviewed regularly as part of the looked after child (LAC) review. The review process enables information to be shared by others including the child's parents, carers, school and other professionals in order to have a comprehensive view of the child's situation.

### **School admissions**

The Department for Education has issued statutory guidance in the form of the [School admissions code](#).

Looked after children are regarded as one of the most vulnerable groups of children in society. As such, it is of paramount importance that a school place is found that meets the child's educational needs as soon as possible. All schools must have oversubscription criteria for each relevant age group and the highest priority must be given, unless otherwise provided in the School Admissions Code to looked after and previously looked after children.

The Virtual School Head (VSH) must ensure that:

the admission authorities are aware that looked after children are excepted pupils from the infant class size limit

the Local Authority, as a corporate parent, should not delay where a looked after child is without an education placement that is appropriate to their assessed needs.

The social worker involved with the looked after child should consult with the VSH on an appropriate education placement for the looked after child. If social workers are unsure about how school admissions work in relation to looked after children they should discuss this with the VSH.

### **School exclusions**

The Department for Education has issued statutory guidance on [Exclusions from maintained schools, academies and learner referral units](#).

Looked after children as a collective have disproportionately high rates of exclusion. They are particularly vulnerable to the impacts of an exclusion. The head teacher should, as far as possible, avoid permanently excluding a looked after child. Schools should proactively cooperate with the child's carers, social worker and Local Authority that looks after the child. If a school has concerns that a looked after child is at risk of exclusion, they should consider whether the provision of additional support would help or if an alternative educational placement is required.

### **Special educational needs (SEN)**

Around 70% of looked after children have some form of SEN. SEN departments should work closely with the VSH as well as social workers to ensure that Local Authorities have effective and joined-up processes for meeting the SEN of looked after children.

The VSH has certain duties and responsibilities towards looked after children with a statement of needs or an Education, Health and Care Plan (EHCP). They must ensure that:

the [SEND code of practice](#), as it relates to looked after children, is adhered to; and

The child's statement or EHCP works in harmony with the child's care plan.

A significant amount of children may be undiagnosed when they begin to be looked after. During the process of putting a PEP in place for looked after children, the Local Authority should ensure

that any undiagnosed SEN are addressed as soon as possible if they are identified through this process.