

Child Safeguarding Policy

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1. Policy Statement

Double Wings International Ltd. (trading as BBEVA, hereinafter referred to as “the BBEVA”) is committed to providing a safe, protected, and positive learning environment for all children involved in its services. BBEVA firmly believe that every child has the right to be free from abuse, neglect, exploitation, and harm in any form. This policy outlines the BBEVA 's commitment, procedures, and responsibilities for safeguarding children, ensuring that all employees, contractors, and volunteers understand and fulfil their safeguarding duties.

This policy is publicly available on the BBEVA website and can also be provided upon request to parents or guardians.

1.1 Purpose of this Policy

The purpose of this policy is to offer guidance and support to ensure that the BBEVA act with due care to protect the safety and well-being of children.

This policy aims to ensure that:

- Appropriate and timely action is taken to safeguard and promote the welfare of children;
- All staff are aware of their statutory responsibilities concerning safeguarding;
- Staff are properly trained in identifying and reporting safeguarding concerns.

1.2 Child Protection Statement

BBEVA fully recognises its moral and legal duty to safeguard and promote the welfare of all students. BBEVA is committed to providing a safe and supportive environment in which students are respected and valued. All staff must remain alert to signs of abuse and neglect and follow established procedures to ensure students receive effective support, protection, and justice. Every member of staff shares equal responsibility for acting on any suspicion or disclosure that may indicate a student is at risk of harm.

BBEVA acknowledges that safeguarding and promoting the welfare of children is the responsibility of everyone. Anyone who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all practitioners must ensure their approach is child-centred. This means they must always consider what is in the best interests of the child.

1.3 Safeguarding Legislation and Policy

This policy is informed by the statutory guidance from the Department for Education (DfE), including [*Keeping Children Safe in Education \(2025\)*](#) and [*Working Together to Safeguard Children \(2023\)*](#), as well as the [*Governance Handbook*](#). BBEVA adheres to these guidelines and to the arrangements agreed and published by our three local safeguarding partners (see Section 3).

This policy is additionally guided by the provisions of the following legislation:

- a) [**The Education \(Independent School Standards\) Regulations 2014**](#), Part 3 of the Schedule, which outlines the duty of academies and independent schools to safeguard and promote the welfare of pupils at the school.
- b) [**The Children Act 1989**](#), as amended by the [**Children Act 2004**](#), which provides the legislative framework for the care and protection of children.
- c) Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by Section 74 of the [**Serious Crime Act 2015**](#), which places a legal duty on teachers to report to the police where they discover that an act of female genital mutilation (FGM) appears to have been carried out on a girl under the age of 18.
- d) [**Statutory guidance on FGM**](#), which outlines responsibilities for safeguarding and supporting girls affected by FGM.
- e) [**The Rehabilitation of Offenders Act 1974**](#), which outlines when individuals with criminal convictions may work with children.
- f) [**Schedule 4 of the Safeguarding Vulnerable Groups Act 2006**](#), which defines “regulated activity” in relation to children.
- g) [**Statutory guidance on the Prevent duty**](#), which explains schools’ responsibilities under the [**Counter-Terrorism and Security Act 2015**](#) to prevent people from being drawn into terrorism and extremism.
- h) [**The Human Rights Act 1998**](#), which affirms that abuse—such as harassment, violence, or sexual abuse—may infringe on any or all of the rights afforded to individuals under the [**European Convention on Human Rights \(ECHR\)**](#).
- i) [**The Equality Act 2010**](#), which makes it unlawful to discriminate against individuals based on certain protected characteristics, including disability, gender, sexual orientation, gender reassignment, and race. This means our governors and leadership management teams must consider how best to support pupils across these characteristics. The Act permits positive action to address specific

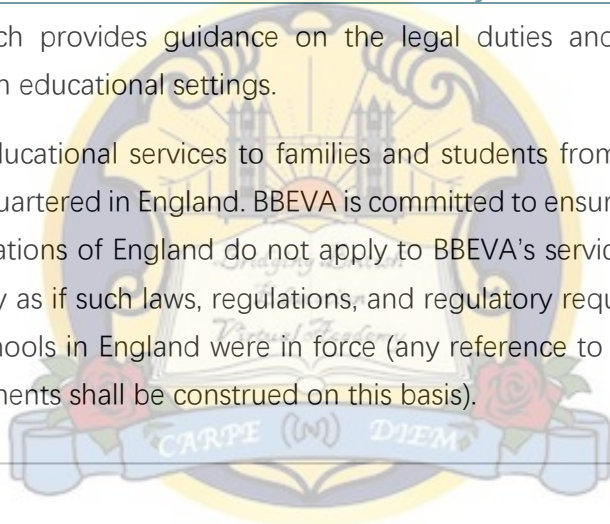
disadvantages affecting pupils, where such action is proportionate. For example, reasonable adjustments must be made for disabled pupils, and schools may take specific steps to support girls disproportionately affected by sexual violence or harassment.

j) [The Public Sector Equality Duty \(PSED\)](#), which requires us to have due regard to the need to eliminate unlawful discrimination, harassment, and victimisation. The PSED helps ensure we focus on key areas of concern and improve outcomes for all pupils, including those at higher risk, such as those facing sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination.

k) [Working Together to Safeguard Children: A Statutory Framework](#), which sets out the responsibilities of agencies to work together to promote children's welfare and protect them from harm.

l) [Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges](#), which provides guidance on the legal duties and best practices for safeguarding in educational settings.

BBEVA provides educational services to families and students from regions across the globe and is headquartered in England. BBEVA is committed to ensuring that, even where the laws and regulations of England do not apply to BBEVA's services, the operation of BBEVA shall comply as if such laws, regulations, and regulatory requirements applicable to independent schools in England were in force (any reference to laws, regulations, or regulatory requirements shall be construed on this basis).



2. Scope of Application

BBEVA is committed to safeguarding the safety and welfare of all children (defined as individuals under the age of 18).

BBEVA expects all staff to share this commitment and to be familiar with this Child Safeguarding Policy.

This policy applies to all individuals working for or contracted by BBEVA, including but not limited to:

- All employees (full-time, part-time, or temporary)
- Independent contractors (e.g. online teachers, tutors, educational consultants and homestay providers)

- Volunteers
- Interns
- Members of the leadership and governing board

All references in this document to “staff” or “members of staff” refer to all individuals working with or on behalf of BBEVA in any capacity, including those whose day-to-day duties do not require direct or regular contact with children. This definition shall also extend to individuals providing homestay accommodation for the students, as well as third-party contractors.

This policy covers all services and activities provided by BBEVA, including but not limited to: online schooling, academic tutoring, educational consultancy, guardianship or any other context involving interaction with children.

Safeguarding Children Aged 18 or Over

Our safeguarding principles apply to all BBEVA students, including those who are legally defined as children (under 18) and those aged 18 or over.

However, the legislation and referral pathways for concerns relating to individuals aged 18 or over differ in the UK. These differences relate to the individual's capacity to make decisions and, in certain circumstances, their ability to consent to a referral. Guidance on the [Mental Capacity Act](#) can be found.

Any staff member who has a concern about a student aged 18 or over should raise it with the DSL in the usual way. For students residing in the UK, the DSL will seek advice from the Safeguarding Adults Board or Safeguarding Adults Hub relevant to the student's place of residence or registration. Since BBEVA provides services to international students who may live outside the UK, the DSL will follow a similar process, while taking into account the international procedures for referring to children's social services and the police.

In all cases, if there is an immediate concern for a student's welfare — such as if they are believed to be at risk of significant harm and/or in immediate danger — the police must be contacted without delay.

Safeguarding Children Outside the UK

Referrals for Overseas Students

The first step will be to contact the relevant country's foreign embassy or high commission to identify the appropriate local/regional authority and, subsequently, the appropriate child protection or safeguarding agency to discuss the case. This initial step involves using the *London Diplomatic List*, available at:

<https://www.gov.uk/government/publications/foreign-embassies-in-the-uk>

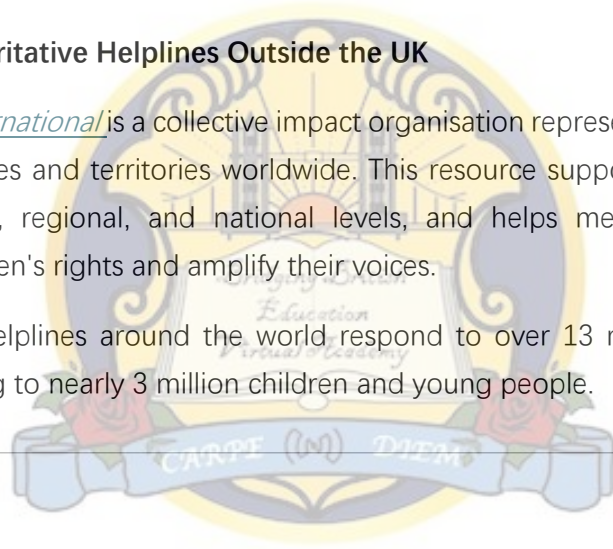
BBEVA recognises that laws and practices differ from country to country. This must be carefully considered before any referral is made. Any potential adverse consequences that such a referral might have for the child or their family, must also be considered.

If BBEVA believes that making a referral could cause more harm than good, the DSL may decide not to report the issue immediately and instead continue to monitor the student. Before making a referral decision, the Safeguarding Team may engage in research and discussion about relevant legal frameworks in the country concerned and assess potential risks to the child.

Identifying Authoritative Helplines Outside the UK

Child Helpline International is a collective impact organisation representing 155 members across 133 countries and territories worldwide. This resource supports child protection systems at global, regional, and national levels, and helps member organisations advocate for children's rights and amplify their voices.

Each year, child helplines around the world respond to over 13 million contacts and provide counselling to nearly 3 million children and young people.



3. Definitions

- **Child:** Any person under the age of 18, in accordance with UK law.
- **Child Safeguarding:** All actions and measures taken to protect children from harm and promote their well-being. This includes preventing abuse (physical, emotional, sexual, and neglect), supporting healthy development, and ensuring a safe environment.
- **Child Protection:** Specific actions taken in response to children who have been harmed or are at risk of significant harm.
- **Designated Safeguarding Lead (DSL):** The individual responsible for overseeing the implementation of BBEVA's safeguarding policy and serving as the primary point of contact for any safeguarding concerns or disclosures (hereinafter referred

to as "DSL").

- **Deputy Designated Safeguarding Lead (DDSL):** The individual who supports the Designated Safeguarding Lead (DSL) in overseeing the implementation of BBEVA's safeguarding policy and acts as a secondary point of contact for safeguarding concerns or disclosures, assisting in ensuring the effective management of child protection and safeguarding matters (hereinafter referred to as "DDSL").
- **Victim:** A widely understood and accepted term to describe someone who has suffered abuse. However, BBEVA acknowledge that not all individuals who have experienced abuse identify as victims or wish to be described as such. BBEVA will be prepared to use whichever terminology the child feels most comfortable with in each case.
- **Alleged Perpetrator(s) / Perpetrator(s):** These terms are widely recognised and commonly used to refer to individuals accused of or responsible for abuse. Nonetheless, BBEVA will consider the language we use carefully—especially when communicating in the presence of children—as abusive behaviour may, in some circumstances, also be harmful to the perpetrator. Terminology will be chosen with care and tailored to the context.
- **Safeguarding and Promoting the Welfare of Children** means:
 - i. Protecting children from abuse
 - ii. Preventing impairment of children's mental and physical health or development
 - iii. Ensuring children grow up in circumstances consistent with the provision of safe and effective care
 - iv. Taking action to enable all children to have the best possible outcomes
- Under *Keeping Children Safe in Education* (KCSIE), and as defined in Chapter 2 of the *Children and Social Work Act 2017*, the following **three local safeguarding partners (LSPs)** are identified. These partners are jointly responsible for arrangements to safeguard and promote the welfare of children in the local area, including the identification of and response to their needs (hereinafter referred to as "LSP"):
 - The Local Authority (LA)
 - Integrated Care Boards (ICBs) within the local authority area (formerly Clinical Commissioning Groups)
 - The Chief Officer of Police for the local police area

- **Abuse (General / Bullying):** Abuse is any act that harms a child. It may involve causing harm directly or failing to prevent harm. Abuse can occur in a child's home, institutional, or community setting, and may be perpetrated by someone known to the child or, in rare cases, by strangers (including online). Abusers may be adults or other children.

Bullying becomes a safeguarding concern when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. (See the BBEVA Anti-Bullying Policy.)

1) Physical Abuse

A form of abuse that 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 symptoms of, or deliberately induces, illness in a child.

2) Emotional Abuse

The persistent emotional maltreatment of a child such that it severely and adversely affects the child's emotional development. It may involve:

- Conveying to a child that they are worthless, unloved, inadequate, or only valued insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them, or ridiculing their communication
- Imposing expectations that are inappropriate to the child's age or developmental stage, including interactions that are beyond their capabilities, overprotection, limitation of exploration or learning, or preventing them from participating in normal social interaction
- Emotional abuse may also include seeing, hearing, or experiencing the abuse of another (as recognised in *Keeping Children Safe in Education*, 2025).
- Serious bullying (including cyberbullying), causing children to feel frequently frightened or in danger, and exploitation or corruption of children may also be forms of emotional abuse.

All forms of abuse involve some level of emotional harm, but emotional abuse can also occur in isolation.

3) Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part

in sexual activities, regardless of whether the child is aware of what is happening.

These activities may involve physical contact, including penetrative acts (such as rape or oral sex) and non-penetrative acts (such as masturbation, kissing, rubbing, or touching through clothing).

Sexual abuse may also include non-contact activities, such as:

- Involving children in looking at, or producing, sexual images
- Watching sexual activities
- Encouraging children to behave in sexually inappropriate ways
- Grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not limited to adult males; women and other children can also commit acts of sexual abuse.

Staff should be aware: Any person aged 18 or over in a position of trust who engages in sexual activity or a sexual relationship with a child—even if consensual—commits a criminal offence. This applies even if the staff member is not directly teaching the child, so long as they are in a position of trust.

- **Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of their health or development.
 - Neglect may begin prenatally, for example, when a mother misuses substances during pregnancy. After birth, neglect may involve:
 - A parent or carer failing to provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
 - Failure to protect a child from physical and emotional harm or danger
 - Failure to ensure adequate supervision (including the use of inappropriate caregivers)
 - Failure to ensure access to appropriate medical care or treatment
 - It may also include the neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Signs of Abuse:** Indicators of abuse may include—but are not limited to: Depression, low self-esteem, withdrawal, poor academic performance, social isolation, self-harm, nervousness, unexplained injuries, eating disorders, or overly

aggressive behaviour. The most common early warning sign is a noticeable behaviour change.

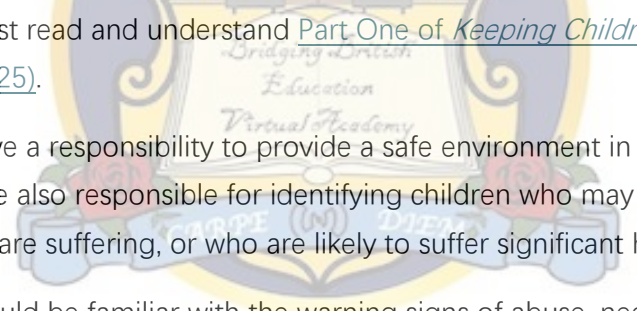
4. Roles and Responsibilities

Everyone who encounters children and their families has a role to play in safeguarding children.

Acknowledging that pupils may reside at considerable distances and in jurisdictions with differing legal frameworks, BBEVA recognises that access to UK-based safeguarding agencies may not always be feasible. Nevertheless, BBEVA remains fully committed to working collaboratively with parents, as well as with all relevant and appropriate local or international authorities, to ensure the protection and well-being of the child.

A. All Staff

All staff play a crucial role in safeguarding, as they are often best placed to identify concerns early, provide timely support, and help prevent issues from escalating.

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- a) All staff must read and understand [Part One of *Keeping Children Safe in Education* \(2025\)](#).
 - b) All staff have a responsibility to provide a safe environment in which children can learn. They are also responsible for identifying children who may need additional support, who are suffering, or who are likely to suffer significant harm.
 - c) All staff should be familiar with the warning signs of abuse, neglect, and exploitation, to recognise children who may be in need of help or protection.
 - d) Staff must provide a safe space for students to speak up and share their concerns.
 - e) Staff should be aware that the risk of harm to children may originate from various sources, both within and outside the home, including online environments.
 - f) Staff should always adopt an “it could happen here” approach to safeguarding.
 - g) When a concern is raised about a child’s welfare, staff must always act in the best interests of the child.
 - h) Staff must also be aware of the risk of child-on-child abuse within the school setting. Any concerns must be promptly reported. All allegations must be taken seriously, and victims should be made to feel supported and protected.

i) Staff should emphasise the importance of online safety when communicating with parents and carers. This includes ensuring parents understand what children are expected to do online (e.g., the websites they are required to access or the people they will be interacting with online).

All staff must be familiar with the following:

- a) The systems in place to support safeguarding, including this Child Safeguarding Policy, the relevant Code of Conduct, the identity and role of the DSL.
 - b) The Early Help assessment process (sometimes referred to as the Common Assessment Framework) and their role in it, including how to identify emerging concerns, liaise with the DSL, and share information with other professionals to support early identification and assessment.
 - c) The procedures for making referrals to local authority children's social care and the potential statutory assessments that may follow, including the role they may be expected to play.
 - d) What to do if a safeguarding concern arises or a child discloses that they are being abused or neglected — including in cases involving Female Genital Mutilation (FGM) — and how to maintain appropriate levels of confidentiality when liaising with other professionals.
 - e) The signs and symptoms of different forms of abuse and neglect, as well as specific safeguarding concerns, such as:
 - Child-on-child abuse
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Risks or indicators of serious youth violence or involvement
 - Female Genital Mutilation (FGM)
 - Radicalisation and extremism
 - Serious violence
- The importance of reassuring victims that they are being taken seriously and will be supported and kept safe.
 - The fact that children may be at risk of harm in a variety of settings: within the family, at school, or online.

- The fact that children who are, or are perceived to be, lesbian, gay, bisexual, or transgender (LGBTQ+) may be particularly vulnerable to targeting by other children.
- What to look out for when identifying children who may need help or protection.

Further guidance on how staff can fulfil these responsibilities is set out in Section 12 of this policy and Appendix 1.

B. Designated Safeguarding Lead (DSL) & Deputy Designated Safeguarding Lead (DDSL)

The DSL is a member of the Senior Leadership Team. At BBEVA, the designated DSL is Mr. Chris Davies. The DSL is responsible for overseeing the implementation of BBEVA's safeguarding policies and acting as the main contact for any child protection concerns. They provide guidance to staff, liaise with external agencies, and ensure the safety and welfare of all children within BBEVA.

Contact Information:

Ding Talk: ID-asn_oe76j1h9z

Email: chris.jdavies@live.co.uk

Tel: +44 7796756817

The DSL will be allocated sufficient time, funding, training, resources, and support to:

- Oversee the implementation of BBEVA's safeguarding and child protection policies.
- Serve as the primary point of contact for any safeguarding concerns or disclosures.
- Provide advice and support to other staff on child welfare and child protection matters.
- Participate in strategy discussions, inter-agency meetings, and/or support other staff to do so.
- Contribute to child welfare assessments.
- Refer suspected cases, as appropriate, to relevant agencies (Local Authority Children's Social Care, Disclosure and Barring Service (DBS), and/or the Police), and support staff who make such referrals directly.

- Maintain up-to-date knowledge of safeguarding legislation, harmful sexual behaviours, and online safety measures, including filtering and monitoring systems.

The DSL will also:

- Report any safeguarding concerns to the Board of Directors.
- Liaise, as appropriate, with the Local Authority Designated Officer (LADO) and case managers for child protection.
- Consult with the Police and Local Authority Children's Social Care workers regarding local responses to sexual violence and sexual harassment, to inform BBEVA's policies.
- Have confidence in the availability of specialist local support services for all children involved in incidents of sexual violence and harassment (including victims and alleged perpetrators) and understand how to access this support.
- Be aware that children must have a "designated appropriate adult" to support and assist them during police investigations or interviews.
- Promote a culture of safeguarding throughout the organisation.

The Deputy Designated Safeguarding Lead (DDSL) supports the Designated Safeguarding Lead (DSL) in their role within the Senior Leadership Team. At BBEVA, the designated DDSL is Ms. Jessica Yang. The DDSL assists in managing the child protection and broader safeguarding agenda within BBEVA, including aspects such as online safety, filtering and monitoring processes, and protecting students in digital environments.

Contact Information:

Email: jessica.r.yang@outlook.com

Tel: +44 07379792968

The DDSL will be provided with sufficient time, funding, training, resources, and support to:

- Assist in providing advice and support to staff on child welfare and child protection matters.
- Participate in strategy discussions, inter-agency meetings, and/or support other staff to do so.
- Contribute to child welfare assessments.

- Help refer suspected cases to appropriate agencies such as Local Authority Children's Social Care, the Disclosure and Barring Service (DBS), and/or the Police, and support staff involved in making such referrals.
- Maintain a thorough understanding of harmful sexual behaviours.
- Develop and maintain a comprehensive knowledge of BBEVA's filtering and monitoring systems and procedures.

Additionally, the DDSL will:

- Support the DSL in reporting safeguarding concerns to the Board of Directors.
- Liaise with the Local Authority Designated Officer (LADO) and case managers regarding child protection matters as appropriate.
- Consult with Police and Local Authority Children's Social Care regarding local responses to sexual violence and harassment to inform BBEVA policies.
- Understand the availability of specialist local support services for children affected by sexual violence and harassment (including victims and alleged perpetrators) and know how to access these services.
- Be aware of the requirement for children to have a "designated appropriate adult" to support them during police investigations or interviews.

C. CEO and Directors

The CEO and Board of Directors will:

- Promote a whole-company safeguarding approach, ensuring safeguarding and child protection are at the forefront and underpin all relevant processes and policies.
- Review and approve this policy at each review cycle, ensuring it complies with legislation, and hold the DSL accountable for its implementation.
- Understand their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and BBEVA's local multi-agency safeguarding arrangements.
- Ensure all staff receive safeguarding and child protection training, including online safety, that is regularly updated and meets the recommendations of safeguarding partners.
- Ensure appropriate filtering and monitoring systems are in place for online activities and review their effectiveness. This includes:

- Ensuring the leadership team and staff understand the current provisions and their expectations, roles, and responsibilities regarding filtering and monitoring as part of safeguarding training.
- Reviewing the *DfE Filtering and Monitoring Standards* and discussing with IT personnel and service providers what is needed to support the school in meeting these standards. As an online school, BBEVA may not need to monitor “on-site” systems, it must ensure all shared resource links are appropriate and comply with government guidance.
- Ensure that:
 - The DSL has the appropriate status and authority to carry out their role, including additional time, funding, training, resources, and support.
 - Online safety is a continuous and integrated theme throughout the school’s safeguarding approach and related policies.
 - The DSL leads on safeguarding, including online safety and understanding existing filtering and monitoring systems and procedures.
 - BBEVA has procedures for dealing with any safeguarding concerns (however minor) or low-level concerns about staff (including supply staff, volunteers, and contractors) that do not meet the harm threshold. Appendix 1 of this policy covers this procedure.
 - The policy reflects that children with Special Educational Needs and Disabilities (SEND) or certain medical or physical health conditions may face additional barriers in identifying abuse or neglect.
- When another organisation provides services or activities (regardless of whether the children attending these services/activities are on BBEVA's premises):
 - Seek assurances that the organisation has appropriate safeguarding and child protection policies/procedures and conduct checks where necessary.
 - Ensure arrangements exist for the organisation to liaise with the school regarding safeguarding arrangements where appropriate.
 - Ensure safeguarding requirements are conditions of use of the school premises, and terminate any agreements if those conditions are not met.

In cases of allegations against the DSL or the DDSL, the CEO will act as the “case manager” as appropriate (see Appendix 1).

The CEO and Directors will read the entire Keeping Children Safe in Education guidance.

Contact Details

If you are concerned that a child is being abused, neglected, exploited, or needs additional support;

If you are concerned that a member of staff may pose a risk of harm to children;

Please contact the Designated Safeguarding Lead (DSL):

Mr. Chris Davies

Ding Talk: ID-asn_oe76jlh9z

Email: chris.jdavies@live.co.uk

Tel: +44 7796756817

In the DSL's absence, please contact the Deputy Designated Safeguarding Lead (DDSL):

Ms. Jessica Yang

Email: jessica.r.yang@outlook.com

Tel: +44 07379792968

If your concern relates to the DSL, please contact the Chair of the Board of Directors:

Mr. Shailer Duan

Email: shailer@bbeva.com

Tel: +44 7421315000

E. Liaison with Local Safeguarding Partners (LSP)

BBEVA will liaise, where necessary, with its Local Safeguarding Partners (LSP) and work in partnership with other agencies in accordance with *Working Together to Safeguard Children*.

Partner schools have their own safeguarding policies, which can be found on their respective websites and will include contact details for their LSP.

BBEVA recognises that if any safeguarding concern arises while a student is in a homestay located outside the county in which their school is based, different or additional LSP arrangements will be required. In such circumstances, BBEVA will contact the relevant LSP and follow their procedures.

This [website](#) provides links to all LSPs nationally. Further details can be found on the relevant local authority website.

Local LADO information for the London Borough of Camden can be found [\[here\]](#), and the contact details are: by sending to the email address LADO@camden.gov.uk or by

calling 02079744556.

In case of any difficulty obtaining contact details, BBEVA will call the police, as they are one of the safeguarding partners.

BBEVA is aware of how to obtain contact details for local agencies, including LSPs across the country, as well as how to access locally agreed inter-agency procedures and guidance.

BBEVA also understands the procedures for making non-urgent reports via the relevant local authority children's services department or Multi-Agency Safeguarding Hub (MASH), or by calling the non-emergency police number 101.

In an emergency, BBEVA understands that it must contact the relevant regional police force by dialling 999, including in Wales and Scotland.

BBEVA is aware that in Scotland, for non-urgent referrals or concerns, it can contact the local Children's Social Work Team. Their contact details can be found on the local authority website for the area where the child resides. Alternatively, the local office of the Scottish Children's Reporter Administration (SCRA) may be contacted via: <https://www.scra.gov.uk/contact-us/>.

Email: communications@scra.gov.uk

Head Office: Scottish Children's Reporter Administration Ochil House, Springkerse Business Park Stirling FK7 7XE

BBEVA understands that in Wales, for non-urgent referrals or concerns, it can contact the local Child Protection Services. Their contact details can be found on the local authority website for the area where the child resides.

F. Liaison with Parents/Guardians, Agents, and Partner Schools

BBEVA may need to share confidential safeguarding information with the DSL at the student's current school. When a student transfers to a new school, safeguarding information may be shared with the DSL at the new school. All schools have their own safeguarding and child protection policies, which set out their procedures. These can be found on their respective websites.

While BBEVA will work openly with parents wherever possible, it reserves the right to contact the LSP or the police without notifying parents if it is considered to be in the best interests of the child.

BBEVA will not normally share safeguarding information with agents unless necessary to protect the student. In such circumstances, information will be provided strictly on a

need-to-know basis and on the understanding that it must be kept strictly confidential.

5. Commitment

BBEVA is committed to:

- Putting the Best Interests of the Child First: Always prioritising the welfare and safety of children in all decisions and actions.
- Creating a Safe Environment: Taking all reasonable steps to ensure that children feel safe and respected on our online platforms and in all interactions.
- Identifying and Responding to Risks of Abuse: Training staff to recognise signs of abuse and establishing clear reporting and response procedures.
- Compliance: Adhering to all relevant UK child safeguarding laws, regulations, and guidance, including but not limited to the Children Act 2004 and *Working Together to Safeguard Children*.
- Continuous Review and Improvement: Regularly reviewing and updating this policy to ensure its effectiveness and relevance.

BBEVA achieve this by:

- Recruiting staff who are suitable to work with children and who have a positive safeguarding awareness;
- Fostering a positive atmosphere where children feel safe and are willing to speak out;
- Encouraging children to trust adults and to speak to trusted individuals if they have concerns;
- Establishing good communication and cooperation with parents and other professional agencies;
- Preventing children's exposure to harmful or inappropriate online content;
- Inspiring children to understand core values and, when appropriate, develop the ability to recognise risks of radicalisation;
- Providing all staff with systematic training, support, and supervision to enable them to identify and appropriately respond to abuse and welfare concerns;

- Encouraging staff to report all safeguarding and welfare concerns confidentially to the DSL;
 - Upholding principles of fairness, respect, and inclusion, rejecting any form of discriminatory behaviour, and helping children learn to respect others;
 - Fulfilling our statutory duties to record and report safeguarding-related incidents;
 - Making every reasonable effort to limit the risks children face when using the organisation's IT systems, and regularly reminding all staff to comply with these standards during remote teaching.
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6. Key Principles

- **Prevention First:** Preventing harm to children through effective recruitment processes, training, and codes of conduct.
- **Early Intervention:** Promptly identifying and responding to child welfare concerns.
- **Respect and Listening:** Respecting children's views and feelings and encouraging them to express their concerns where appropriate.
- **Collaboration and Communication:** Maintaining effective communication and cooperation with parents, guardians, and relevant agencies (such as local authority children's services).
- **Confidentiality and Information Sharing:** Handling sensitive information carefully while protecting children's safety, and understanding when and how to share information to safeguard children.

Every individual who comes into contact with children and their families plays a vital role in child protection.

Given that our students are frequently based overseas and subject to different legal jurisdictions, BBEVA recognises that access to UK safeguarding agencies may not always be feasible. Nevertheless, BBEVA is fully committed to safeguarding the welfare of children by working in close collaboration with parents and all relevant and appropriate local authorities.

7. Equality Statement (Incorporating Anti-Discrimination Policy)

BBEVA acknowledges that some children may be more vulnerable to abuse—whether online or offline—and that certain children may encounter additional challenges in recognising or disclosing such harm. BBEVA is committed to maintaining an anti-discriminatory approach and to recognising and respecting the diverse backgrounds and circumstances of all children. BBEVA ensures that every child is afforded equal protection, regardless of any individual barriers they may experience.

BBEVA gives particular consideration to the following children:

- Children with special educational needs and/or disabilities or health issues (whether or not they have a statutory Education, Health and Care Plan (EHCP));
- Children at risk due to their own or family members' mental health needs;
- [Young carers](#);
- Children who may face discrimination due to their race, ethnicity, religion, gender identity, or sexual orientation;
- Children for whom English is an additional language;
- Children known to be living in difficult circumstances—such as temporary accommodation or where there are issues of substance abuse or domestic violence;
- Children at risk of Female Genital Mutilation (FGM), sexual exploitation, forced marriage, or radicalisation;
- Asylum seekers;
- Looked-after children or those who have previously been looked after (see Appendix);
- Children with a history of persistent or multiple absences or those who are missing from education.

BBEVA is committed to playing a central role in preventative education as part of a whole-company approach to safeguarding and children's wellbeing. This includes equipping children with the knowledge, skills, and confidence necessary to navigate modern life safely and responsibly.

This approach is embedded within a culture of zero tolerance for sexism, misogyny, misandry, homophobia, biphobia, transphobia, and all forms of sexual violence or

harassment.

Our commitment to preventative education and the promotion of respectful, inclusive environments is underpinned by the following policies:

- Behaviour and Discipline Policy
- Anti-Bullying Policy
- Anti-Discrimination and Equal Opportunities Policy
- Curriculum Policy
- Code of Conduct for Teachers
- E-Safety Policy
- Special Educational Needs Policy
- Concerns & Complaints Policy
- Privacy Policy
- Safer Recruitment Policy

8. Confidentiality

BBEVA acknowledges that all safeguarding matters involving children must be handled with the utmost sensitivity and confidentiality.

Any information relating to safeguarding concerns is shared strictly on a “need to know, content, and timing” basis, in accordance with legal and professional standards.

All staff, volunteers, and third-party providers are expected to uphold BBEVA’s confidentiality standards as outlined in the Privacy Policy and their respective safeguarding training.

Disclosures or concerns about individuals must not be discussed in any informal setting, whether on or off BBEVA premises, and should only be shared during appropriately convened safeguarding meetings.

This approach ensures the privacy and dignity of those involved, supports the integrity of any ongoing investigations, and prevents unauthorised disclosure that could compromise evidence or trust.

- **The Data Protection Act 2018 (DPA)** and **UK GDPR** do not prevent or limit the sharing of information to safeguard children. If staff have any doubts about sharing information, they should consult the DSL. Fear of sharing information must never be allowed to hinder safeguarding and promoting a child's welfare.
- Where staff need to share "special category personal data," the DPA 2018 allows practitioners to share information without consent when it is not possible to obtain consent, it is reasonable to expect consent cannot be obtained, or obtaining consent would put the child at risk, as safeguarding children and vulnerable individuals is a lawful processing condition.
- Staff must never promise confidentiality to a child who is reporting abuse, as this may not be in the child's best interests.
- If a victim asks BBEVA not to tell anyone about sexual violence or sexual harassment:
 - There is no clear-cut answer, as staff may still lawfully share information if there is another legal basis to do so under UK GDPR, even if the victim does not consent.
 - The DSL must weigh the victim's wishes against their duty to protect the victim and other children.

The DSL should consider:

- Notifying parents or carers unless this increases the risk to the victim.
- The fundamental safeguarding principle: if a child is at risk of harm, in immediate danger, or has been harmed, a referral should be made to the local authority children's social care.
- Rape, penetrative assault, and sexual assault are criminal offences. Reports of these should be referred to the police. Although the age of criminal responsibility is 10 years, referrals to the police should still be made even if the alleged perpetrator is under 10.
- Regarding anonymity, all staff will:
 - Understand the anonymity, witness support, and general criminal process when allegations of sexual violence or harassment enter the criminal justice system.
 - Take all reasonable steps to protect the anonymity of any child involved in reports of sexual violence or harassment, including carefully

considering which staff need to know the details and the support offered to the child.

- Consider the potential impact of social media in spreading rumours and exposing victims' identities.
 - The government's [*Safeguarding Practitioner Information Sharing Advice*](#) contains seven "golden rules" of information sharing to guide staff in making decisions.
 - Staff should always consult the DSL if in doubt about sharing information.
 - Confidentiality is also addressed in Section 12, Section 14 and Appendix 1 (Allegations Against Staff) of this policy.
-

9. Recruitment and Selection (Incorporating Safer Recruitment Policy)

BBEVA is committed to delivering the highest standards of care and education to all students, while actively safeguarding and promoting the welfare of children and young people. BBEVA is equally dedicated to fostering a supportive, inclusive, and flexible working environment for all staff members.

BBEVA recognises that the achievement of our mission is intrinsically linked to our ability to attract, recruit, and retain highly qualified professionals who are aligned with BBEVA's values and uphold the highest standards of integrity and professional conduct.

Accordingly, BBEVA maintains robust and transparent recruitment and selection procedures to ensure that all individuals employed by, contracted with, or volunteering for BBEVA—particularly those in direct contact with children—are appropriately vetted and demonstrably suitable to undertake their roles in accordance with statutory safeguarding requirements.

The aims of BBEVA's safer recruitment are as follows:

- To ensure the best possible candidates are recruited on the basis of merit, ability, and suitability for the role;
- To deter, identify, and reject potential applicants who may be unsuitable to work with children or young people;
- To ensure that all applicants for roles are treated equally and consistently;
- To ensure that no applicant is treated unfairly on any grounds, including race, colour, nationality, ethnic or national origin, religion or religious belief, gender or

sexual orientation, marital or civil partnership status, disability, or age;

- To ensure compliance with all relevant UK legislation, guidance, and statutory requirements, including the Department for Education's statutory guidance Keeping Children Safe in Education (KCSIE), the Prevent Duty, and relevant guidance or codes of practice issued by the Disclosure and Barring Service (DBS);
- To uphold BBEVA's commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

BBEVA follows all government guidance and procedures regarding safer recruitment, which include:

- Background Checks (DBS Checks): Enhanced Disclosure and Barring Service (DBS) checks will be conducted on all individuals who have unsupervised contact with children and updated regularly.
- Interviews: Safeguarding-related questions are included in all interview processes.
- Reference Checks: Previous employers or referees will be contacted to verify the applicant's experience and record working with children.
- Code of Conduct: All employees and teachers must read and sign BBEVA's *Employee Code of Conduct* or Code of Conduct for Teachers upon joining, which sets out expected behaviours when interacting with children.

BBEVA determines candidate suitability based on the following checks and evidence:

- Criminal record checks (DBS)
- Prohibition list checks
- Barred list checks
- References and interview information

At least one member of every recruitment panel will have received safer recruitment training.

Any offer of employment, including for those who have lived or worked overseas, is conditional upon satisfactory completion of all pre-employment checks.

When employing new staff, BBEVA will:

- Verify the identity of candidates using guidelines available on the GOV.UK website;
- Obtain an enhanced DBS certificate from applicants (including barred list information for regulated activity roles);

- Verify candidates' physical and mental health to ensure they are fit to perform their duties;
- Verify professional qualifications where applicable.

All recruitment decisions are made in line with safer recruitment guidance and in accordance with the relevant legal and regulatory frameworks, including *Keeping Children Safe in Education (KCSIE)*, *Working Together to Safeguard Children*, and relevant data protection and equality legislation.

BBEVA remains committed to continual review and improvement of its recruitment processes to ensure they remain robust, fair, and effective in protecting the safety and well-being of children in our care.

10. Training and Awareness

BBEVA is committed to ensuring that all personnel engaged in our services—including employees, contractors, volunteers, homestay providers, and affiliated external organisations—receive comprehensive, role-appropriate safeguarding training and guidance. Training covers:

- Recognising Signs of Abuse: Physical, emotional, sexual abuse, and neglect indicators and symptoms.
- Reporting Procedures: How and when to report safeguarding concerns.
- Online Safety: Specific risks related to online teaching and tutoring, and how to keep children safe in virtual environments.
- Confidentiality and Information Sharing: Principles of information sharing in safeguarding children.
- A comprehensive understanding of this policy.

◆ Core Safeguarding Training for All Personnel

Scope: Employees, contractors, volunteers, homestay providers, external tutors, and partner agencies.

Content:

- a) Recognising Signs of Abuse
 - Physical, emotional, sexual abuse, and neglect: key indicators and early

warning signs.

- b) Reporting Procedures
 - When, how, and to whom to report safeguarding concerns, including emergency escalation.
- c) Online Safety
 - Risks associated with virtual teaching, e-tutoring, and social media; best practice for supervision, filtering, and monitoring.
- d) Confidentiality & Information Sharing
 - GDPR and data-protection compliance; “need-to-know” principle; lawful bases for sharing safeguarding information.
- e) Policy & Code of Conduct Familiarisation
 - In-depth review of *BBEVA's Safeguarding Policy, Behaviour Policy, and Code of Conduct for Teachers* and other related policies.

Delivery & Frequency:

- Induction Training: Mandatory for all new joiners before they commence any duties involving children.
- Annual Refresher: Updates via e-learning modules, staff newsletters, or dedicated safeguarding seminars.
- Record-Keeping: The HR and Safeguarding Teams maintain a central register of completed training and expiry dates.

◆ All Staff

All staff receive safeguarding and child protection training at induction, including reporting procedures and online safety, ensuring they understand BBEVA's safeguarding systems, their responsibilities, and how to recognise possible signs of abuse or neglect.

This training is regularly updated and will:

- Be integrated, coordinated, and viewed as part of the whole-company safeguarding approach and wider staff training and curriculum planning.
- Comply with the guidance from the three safeguarding partners.
- Include online safety, covering staff expectations, roles, and responsibilities in relation to filtering and monitoring.

- Refer to the *Code of Conduct for Teachers*, supporting all teachers to:
 - Manage behaviour effectively to ensure a good and safe environment;
 - Have a clear understanding of the needs of all students.

Staff will also receive regular safeguarding updates at least annually (e.g., via email, newsletters, and staff meetings).

BBEVA will maintain accurate records of all staff safeguarding training and regularly update these.

Staff must remain vigilant and aware of their responsibilities and supervisory duties regarding filtering and monitoring pupils' online content access.

All school staff should be aware that abuse, neglect, and safeguarding concerns rarely occur in isolation, and often involve multiple, overlapping issues.

◆ **The DSL and Deputies**

The Designated Safeguarding Lead (DSL) and deputies will receive child protection and safeguarding training at least every two years.

In addition, they will regularly (at least annually) update their knowledge and skills (e.g., via newsletters, meetings with other DSLs, or dedicating time to safeguarding developments).

They will also undertake Prevent awareness training.

◆ **CEO and Directors**

- Strategic Safeguarding Induction: Comprehensive briefing on the BBEVA's safeguarding framework, legal duties, and governance expectations.
- Regular Governance Updates: Biannual training sessions on emerging safeguarding legislation, policy review, and performance monitoring.
- Allegations Management: Specific instructions for the CEO in fulfilling the "case manager" role for complaints or allegations involving senior staff.

◆ **Homestay Providers and External Partners**

BBEVA's homestay providers and external partner organisations (e.g., activity providers, transport services) receive additional, tailored guidance to safeguard students:

- Pre-Placement Briefing: Overview of homestay safeguarding standards, emergency protocols, and child-friendly boundaries.
- Safeguarding Guidance: A practical guide covering host-family best practices,

recognising distress in students, and secure home-environment checks.

- Ongoing Support: Regular check-ins by the BBEVA team, plus access to a 24/7 emergency helpline for safeguarding concerns.

Continuous Improvement

BBEVA regularly reviews and refines its training programme to reflect changes in legislation, best practice guidance (e.g., KCSIE, Working Together to Safeguard Children), and feedback from staff, homestay providers, and external partners. This ensures our safeguarding culture remains robust, consistent, and effective across all contexts in which BBEVA operates.

11. Code of Conduct

All staff, including employees, contractors, and volunteers, must adhere to BBEVA's *Code of Conduct*. Key points include:

- **Professional Boundaries:** Maintain professional and appropriate boundaries with children, avoiding any behaviour that could be misinterpreted as inappropriate.
 - **Respect:** Always treat children with respect and engage with them in a respectful manner.
 - **Transparency:** Maintain transparency in online interactions and, where possible, ensure another adult is aware or present (e.g., encourage parents to be present or aware during online sessions if conditions allow).
 - **Avoid Inappropriate Communication:** Avoid inappropriate private communication with children via phone, text, social media, or other channels. All communication should occur through company-approved platforms.
 - **No Acceptance of Gifts or Services:** Do not accept personal gifts, money, or services from children or their parents, except for small symbolic gifts permitted by BBEVA policy.
 - **Do Not Share Personal Information:** Do not share personal contact details or personal life information with children.
 - **Use Appropriate Language:** Use professional and age-appropriate language in all interactions with children.
-

12. Reporting Procedures

(Please refer to the flowcharts in the [“Working Together to Safeguard Children”](#) (December 2025 edition) and [“Keeping Children Safe in Education”](#) (KCSIE 2025) for detailed guidance.)

If any staff member becomes aware of signs of abuse, neglect, or exploitation, or suspects that a child or young person may be at risk, they must promptly record their concerns in writing and immediately report them to the DSL.

Staff should not attempt to determine whether the concern merits reporting — all concerns must be reported without delay.

12.1 Recognising Abuse and Taking Action

BBEVA has established a clear procedure for reporting safeguarding concerns:

- Step 1: Internal Reporting
 - Any employee, contractor, or volunteer who has any concern about a child's welfare or suspects abuse must immediately report to the DSL.
 - Reports should be as detailed as possible, including dates, times, specific behaviours observed or information heard, and persons involved.
 - Reports should be made even if the concern is uncertain.
- Step 2: Responsibilities of the DSL
 - The DSL will assess the report and decide on further action in accordance with UK law and guidance from local children's services.
 - The DSL will contact relevant local authority children's services or police if necessary.
 - The DSL will ensure that all reports and actions taken are accurately recorded.
- Step 3: External Reporting
 - If the DSL believes the child is at immediate risk or in urgent danger, they will directly contact the local authority children's services or the police.
 - In exceptional circumstances, if an employee is dissatisfied with the

DSL's response or believes the situation is urgent and the DSL is unavailable, the employee has the right to contact local authority children's services or police directly.

12.2 If a Child Makes a Disclosure to You

If a child discloses a safeguarding concern to you, you should:

- Listen carefully and attentively;
- Allow the child or young person to speak freely — do not interrupt or speak on their behalf;
- Only ask questions when necessary to clarify, avoiding investigative or leading questions;
- Stay calm and avoid showing shock or distress;
- Reassure the child that they did the right thing by telling you and explain that it is not their fault;
- Emphasise that telling someone was the right decision; avoid saying they should have told you sooner;
- Do not criticize or speak negatively about the alleged perpetrator;
- Explain what will happen next and that you must pass on the information; do not promise confidentiality;
- As soon as possible, write down the conversation in the child's own words. Stick to facts and do not add your own interpretations;
- Sign and date the record, then pass it to the DSL. Alternatively, if appropriate, refer directly to children's social services and/or the police, and inform the DSL as soon as possible that you have done so. Do not share information with anyone else unless instructed by safeguarding authorities involved in the process.

Please note some children may:

- Not be ready or know how to tell someone about abuse, exploitation, or neglect;
- Not recognise their experience as harmful;
- Feel embarrassed, ashamed, or threatened, possibly due to their

vulnerabilities, disabilities, sexual orientation, and/or language barriers.

None of these should prevent you from maintaining “professional curiosity” and discussing any concerns with the DSL.

12.3 If You Have Concerns About a Child

(As opposed to believing a child is suffering or likely to suffer harm, or is in immediate danger)

The flowchart below illustrates the procedure to be followed when you have any concern about the welfare of a child.

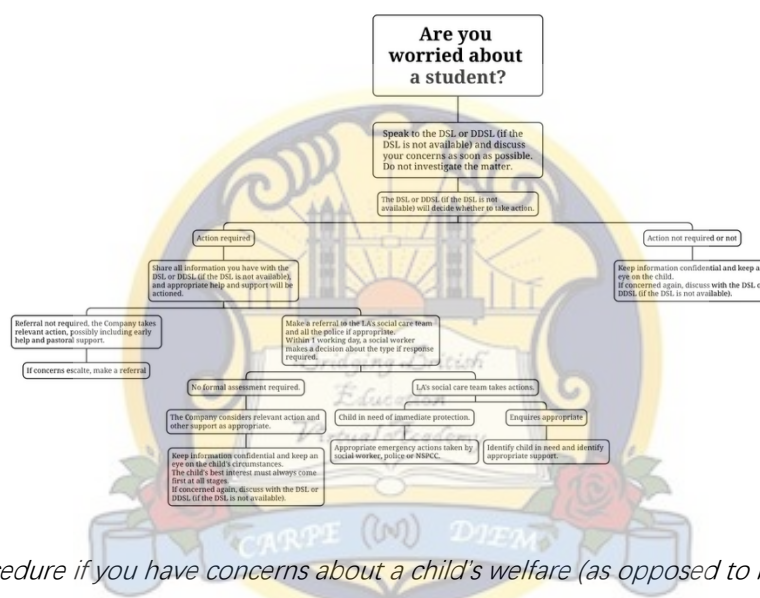


Figure 1: Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger)

Every member of staff who becomes concerned about a child's safety and welfare, whether or not they have received a disclosure from the child, must report their concern as soon as possible to the DSL. If a child is suffering, or is likely to suffer, significant harm, the DSL must be notified immediately.

If, in exceptional circumstances, the DSL is unavailable, this should not delay appropriate action. You should consult the DDSL or a member of the senior leadership team and/or seek advice from the local authority's Children's Social Care department.

You may also seek advice at any time via the NSPCC Helpline on 0808 800 5000. You should share the details of any action you take with the DSL without delay.

If appropriate, you may refer a child directly to the local authority Children's Social Care department (see below under "Referral"). You should share details of any such action with

the DSL as soon as possible.

You should be aware that, if you are concerned that a child is suffering, or is likely to suffer, significant harm, you may refer the matter directly to the police or other external agencies.

- Where there is an immediate risk of harm, you must refer the concern immediately by telephone to the Local Authority Designated Officer (LADO) in that area or to the police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL in writing to the Local Safeguarding Partner (LSP) in that area.
- If unsure how to respond, the DSL may seek advice from Social Care or another appropriate agency.
- Safeguarding concerns relating to an incident in school will be referred by the DSL to the school's own DSL.
- Where a concern does not meet the threshold for referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.
- Wherever possible, BBEVA will share any safeguarding concerns, or the intention to refer a child to Children's Social Care, with parents or carers. However, BBEVA will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. In such circumstances, it may be necessary to consult the LSP and/or the police for advice on when to share information with parents or carers.
- If a member of staff or a host family member continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, that individual should press for a reconsideration of the case with the DSL.

These procedures are intended to ensure that all concerns are addressed and followed up promptly and appropriately, thereby safeguarding the welfare of children and young people.

Following submission of a report to the DSL, the person concerned must continue to monitor the child's safety and welfare.

If, after a period of time (more than seven days), concerns remain unresolved, the member of staff should contact the DSL again to ascertain what action is being taken. If

necessary, they should challenge any lack of action and follow up with the DSL and relevant external agencies as appropriate.

All concerns, discussions, decisions made, and the reasons for those decisions must be recorded in writing. Full records of all reports and actions taken will be maintained by the DSL and securely stored in a dedicated safeguarding file.

Any member of the BBEVA community who raises a concern about a student's safety and welfare can be confident that BBEVA will always fully support their actions.

12.4 Whistleblowing

All staff are duty-bound to report any concerns regarding inappropriate or unsafe practices, particularly those affecting the care and protection of children. Staff should feel empowered to raise issues relating to poor or unsafe practices and potential weaknesses in BBEVA's safeguarding arrangements, secure in the knowledge that the senior leadership team will treat such concerns with the utmost seriousness.

Should any member of staff believe that safeguarding best practices are not being adhered to, or that certain procedures may place one or more students at risk, they must initially report their concerns to the DSL or to the DDSL in the DSL's absence. In the event that the concern involves the DSL, the matter should be escalated directly to the Chair of the Board of Directors.

No member of staff will face detrimental treatment or disciplinary action for raising genuine concerns about unsafe practices through the whistleblowing procedure.

If any staff feels unable to report a safeguarding concern to the DSL (or to the Deputy DSL if the DSL is unavailable) or believes that their concern has not been adequately addressed, they may contact the NSPCC Whistleblowing Helpline on 0800 028 0285 (Monday to Friday, 8:00 am–8:00 pm) or by email at help@nspcc.org.uk.

12.5 Early Help Assessment

Where an early help assessment is appropriate, the DSL will usually take responsibility for liaising with other agencies and, where necessary, setting up multi-agency assessments. Staff may be asked to support other agencies and professionals with early help assessments and, in some cases, may take on the role of lead practitioner.

The DSL will continually review cases, and if the situation does not appear to improve, the school will consider referring the child to the local authority children's social services.

The timeline for intervention will be monitored and reviewed.

12.6 Referral

If it is appropriate to refer a case to the local authority children's social services or the police, the DSL will make the referral or support you to do so.

If you make a direct referral yourself, you must inform the DSL as soon as possible.

The local authority will decide what action to take within one working day of receiving a referral and will inform the referrer of the outcome. If the DSL or referrer does not receive this information, they must follow up with the local authority and ensure the outcome is properly recorded.

If, following referral, the child's situation does not appear to improve, the DSL or referrer must follow local escalation procedures to ensure that their concerns are addressed and the child's situation improves.

12.7 If You Have a Concern About Mental Health

Mental health issues can, in some cases, indicate that a child is suffering or at risk of suffering abuse, neglect, or exploitation.

Staff should be alert to behavioural signs that may suggest a child is experiencing mental health difficulties or is at risk of developing such issues.

If your concern about a child's mental health also involves safeguarding concerns, you must take immediate action and follow the steps outlined in Section 12.3.

If your concern about mental health does not constitute a safeguarding concern, discuss the matter with the DSL to agree on an appropriate course of action.

BBEVA follow the Department for Education's guidance on [*Mental Health and Behaviour in Schools*](#) for further information.

BBEVA is committed to providing comprehensive and ongoing support to children with mental health needs.

a. Early Identification & Prevention

- Regular Wellbeing Surveys & Check-Ins
 - Mentors, advisers, or the guardianship team will conduct scheduled mental health questionnaires or one-to-one meetings with students.

- Training & Awareness Raising
 - All staff and partners receive training in mental health recognition and referral procedures to ensure early identification of emerging concerns.

b. Family & School Coordination & Referral

- Timely Parent Communication
 - With the student's consent—or immediately in an emergency—BBEVA will notify parents of any concerns and agree on next steps.
- School Liaison
 - For children under BBEVA's guardianship, the guardian will coordinate with the student's school pastoral lead or houseparents to develop a joint support plan, and, where necessary, request adjustments to academic or boarding arrangements.
- External Professional Resources
 - If further assessment or treatment is required, BBEVA will facilitate contact with psychologists, psychiatrists, or child and adolescent mental health services, and assist parents with booking and accompaniment.

c. Leave of Absence & Withdrawal

- Leave of Absence
 - When a multi-party assessment (BBEVA, school, parents, and professional diagnosticians) deems it necessary for a child to pause their studies for treatment or recuperation, BBEVA will assist with:
 1. Coordinating the leave-of-absence application;
 2. Helping parents arrange a host family or local medical/therapeutic supervision;
 3. Regularly monitoring the student's recovery and liaising with the school on return-to-study timing.
- Withdrawal & Transfer
 - If a child's condition does not improve following leave and continues to impede their safety or academic progress, BBEVA will work with parents and the school to arrange withdrawal or transfer, including:
 1. Organising safe transport home or to a location designated by the parents;
 2. Assisting with obtaining school withdrawal approval, diagnostic

reports, and academic records;

3. Helping parents connect with specialised rehabilitation or educational providers for ongoing support.

d. Record-Keeping & Confidentiality

- Thorough Documentation
 - All counselling sessions, interventions, meetings, and referrals are logged in the student's safeguarding file and reviewed periodically by the **DSL**.
- Privacy Protection
 - Mental health information is shared only on a “need-to-know” basis, with the student's consent or when legally or safely required, in strict compliance with GDPR and UK Data Protection legislation.

Through these measures, BBEVA ensures that every child with mental health needs receives timely, professional, and holistic support and can safely and smoothly arrange any necessary leave or withdrawal.

12.8 If You Have a Concern About a Staff Member, Volunteer, Homestays or Contractor

If you have concerns about a member of staff (including supply teachers, volunteers, homestay providers or contractors), or if anyone makes an allegation that a member of staff may pose a risk of harm to children, you must speak to the DSL without delay.

If your concerns or the allegation involve the DSL, you should speak directly to a member of the Board of Governors. The DSL or Governor will then follow the procedures set out in the Appendix.

If you believe that reporting your concern or allegation to the DSL would present a conflict of interest, you must report directly to the Local Authority Designated Officer (LADO).

All individuals working for or on behalf of BBEVA—whether as employees, contractors, volunteers, or homestay providers—are required to report any conduct, practice, or behaviour that could place a child at risk of abuse or serious harm. No person will face disciplinary or retaliatory action for raising a concern in good faith.

If you receive allegations relating to incidents involving individuals or organisations using BBEVA's premises for activities with children, you must follow BBEVA's safeguarding procedures and notify the relevant LADO(s) in the local authorities where the staff and

students reside, in the same way as any safeguarding allegation.

Everyone working for or on behalf of BBEVA must understand that any conduct judged to have crossed the “harm threshold” may be referred to the police or other statutory authorities. The harm threshold is met when an allegation indicates that, if the person continued to work in their current role—or in any role involving regular or close contact with children—they would pose a risk of harm.

An allegation meets the harm threshold if it indicates that an individual has:

- Behaved in a way that has harmed, or may have harmed, a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child in a manner indicating they may pose a risk of harm if they continue in a role involving regular or close contact with children; or
- Behaved, or may have behaved, in a way indicating they are unsuitable to work with children (including conduct outside the workplace).

Any allegations will be dealt with under the individual's contract or engagement terms (as some tutors are self-employed freelancers).

Classification of Outcomes:

- Substantiated: sufficient evidence that the allegation is true;
- Malicious: sufficient evidence that the allegation is untrue and was made with intent to deceive or harm;
- False: sufficient evidence that the allegation is untrue;
- Unsubstantiated: insufficient evidence to prove or disprove the allegation (does not imply guilt or innocence);
- Unfounded: no evidence or credible basis for the allegation.

BBEVA and the relevant authorities will determine the outcome based on the nature, severity, and available evidence. Possible outcomes include taking no further action, dismissal, or ceasing to use the individual's services.

If a staff member resigns or their contract ends in the course of an investigation, BBEVA will continue to pursue the allegation and, if substantiated, will make a referral to the Disclosure and Barring Service (DBS) to consider placement on the children's barred list. Resignation will not prevent BBEVA from making a DBS referral or reporting to any other relevant body as required by law.

Where the person is a qualified teacher, the DSL will also consider a referral to the Teaching Regulation Authority (TRA) to determine if the individual should be prohibited from teaching. BBEVA has a legal duty to refer to the DBS and, where appropriate, to the TRA whenever it believes a person has engaged in conduct that harmed, or could have harmed, a child.

Suspension is not automatic and will be considered in line with safeguarding priorities and a fair investigation process. If the allegation involves a homestay household member, alternative accommodation will be arranged for the student until the matter is resolved.

Following any incident, the DSL and leadership team will review safeguarding policies and procedures to ensure ongoing effectiveness.

For detailed procedural steps, see Appendix: Allegations Made Against Staff.

12.9 Allegations Made Against Other Pupils

All staff are trained to be aware that safeguarding concerns may manifest through peer-on-peer abuse.

Such abuse most commonly includes, but is not limited to: bullying (including cyberbullying), gender-based and prejudicial violence, grooming, sexual harassment, sexual assault, sending of nude or semi-nude images (sexting), gender-related issues within peer groups, upskirting, peer-on-peer relationship abuse, and initiation rituals (also known as “hazing”).

Peer-on-peer abuse must never be considered normal, tolerated, or dismissed as “banter” or “part of growing up,” as doing so contributes to a culture of unacceptable and normalised behaviour and creates an unsafe environment for children.

Most incidents where pupils cause harm to other pupils will be dealt with under BBEVA’s Behaviour Policy. However, this Safeguarding Policy will apply to any allegation that raises safeguarding concerns. This may include allegations that:

- Are serious and may constitute a criminal offence;
- Could put pupils at risk;
- Involve violence;
- Involve the use of drugs or alcohol to coerce others;
- Involve sexual exploitation, abuse or harassment — such as indecent exposure, sexual assault, upskirting, or the sharing of inappropriate sexual images or videos

(including nude or semi-nude images).

BBEVA recognises that [girls are more likely to be victims and boys more likely to be perpetrators of peer-on-peer abuse](#); however, all children can be victims and perpetrators and all forms of such abuse are unacceptable and will be treated with seriousness and urgency.

BBEVA also acknowledges that the absence of reported incidents does not mean abuse is not occurring — it may simply be unreported.

BBEVA actively encourage children to report any form of peer-on-peer abuse, sexual harassment, or sexual violence to a trusted adult, parent, or peer. All concerns raised by children will be respected and taken seriously at all times.

If a member of staff suspects that a child may be at risk of, or experiencing, peer-on-peer abuse, they must discuss their concerns with the DSL to determine an appropriate course of action.

If a child makes an allegation against another child:

- You must record the allegation and inform the DSL, but you must not conduct any investigation yourself.
- The DSL will contact the local authority for the child and/or children's social care services, and will follow their guidance. If the allegation involves a potential criminal offence, the police will also be contacted.
- The DSL will develop a risk assessment and support plan for all children involved — including the victim, the alleged perpetrator, and any other affected individuals — and will assign a trusted adult for each child to speak to if needed. This will include consideration of vulnerable contexts such as school transport.
- Where appropriate, the DSL will make referrals to [Child and Adolescent Mental Health Services \(CAMHS\)](#).

If the incident is of a criminal nature and there is a delay in criminal proceedings, the DSL will work closely with the police (and other relevant agencies, where appropriate) to ensure the protection of the children involved and to implement any disciplinary actions required. Where there is uncertainty about the investigation, the DSL will consult the police for clarification.

For further information regarding child-on-child abuse, please refer to Appendix 2.

12.10 Pupils with Special Educational Needs, Disabilities or Health Issues

BBEVA recognises that pupils with special educational needs (SEND) or certain health conditions can face additional safeguarding challenges, and that they are three times more likely to be abused than their peers. There may be additional barriers in identifying abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse (e.g., behaviour, mood, injuries) relate to the child's condition without further exploration;
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils;
- Pupils with SEND, disabilities or certain health conditions being disproportionately affected by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges.

Any incidents of abuse involving a pupil with SEND must be closely coordinated with the DSL and the Special Educational Needs Coordinator (SENCO).

12.11 Creating a Supportive Environment at BBEVA and Minimising the Risk of Peer-on-Peer Abuse

BBEVA recognises the importance of taking proactive steps to minimise the risk of peer-on-peer abuse and of creating an environment where victims feel confident to report concerns.

To achieve this, BBEVA will:

- Challenge all forms of derogatory or sexualised language or inappropriate behaviour between peers, including requests for or sending of sexual images;
- Be alert to gender-specific issues — such as sexualised touching or groping of female pupils, and hazing or initiation-type violence among boys;
- Ensure that the BBEVA's curriculum helps educate pupils about appropriate behaviour and consent;
- Ensure pupils are able to report abuse easily and confidently using our reporting system (as outlined in Section 12.12);
- Ensure that staff reassure victims that they are being taken seriously;
- Remain alert to reports of sexual violence and/or harassment that may indicate environmental or systemic problems, which can be addressed through policy or

curriculum updates, or shared with safeguarding partners as part of broader local concerns;

- Support children who have witnessed sexual violence, especially rape or penetrative assault. Every effort will be made to ensure that victims, alleged perpetrators, and any witnesses are not subjected to bullying or harassment;
- Consider any harm within the family and the potential need for support for siblings following reports of sexual violence and/or harassment;
- Ensure all staff are trained to understand:
 - How to recognise indicators and signs of peer-on-peer abuse, and how to identify and respond to disclosures;
 - That the absence of reports does not mean abuse is not happening — staff should maintain an attitude of “it could happen here”;
 - That they should take action if they have any safeguarding concerns and not wait to be told, as victims may not always make direct disclosures. For example:
 - A child may show signs or behave in ways intended to alert adults;
 - A friend may make a disclosure;
 - Staff may overhear conversations;
 - A child's behaviour may suggest something is wrong;
 - That some children, because of their vulnerability, disability, gender, ethnicity and/or sexual orientation, may face additional barriers in disclosing abuse;
 - That a child who harms a peer may themselves be a victim of abuse, and this falls within the scope of this policy;
 - The important role they play in preventing peer-on-peer abuse and responding when they suspect a child is at risk;
 - That they should speak to the DSL if they have any concerns;
 - That social media may play a significant role in the aftermath of any incident or alleged incident, including interactions between victims, alleged perpetrators, and their peer groups.

The DSL will lead on any disciplinary action taken in relation to an alleged perpetrator.

Support will be provided alongside any disciplinary measures.

Disciplinary action may proceed in parallel with other investigations (e.g. police investigations). The fact that other agencies are investigating or have investigated an incident does not prevent BBEVA from reaching its own conclusion and taking appropriate disciplinary action based on what has occurred. In making these decisions, BBEVA will consider:

- Whether any action would prejudice an ongoing investigation and/or any subsequent prosecution — the school will consult with the police and/or local authority children's social care to determine this;
- Whether the circumstances prevent us from reasonably forming a conclusion about what happened while an independent investigation is ongoing.

12.12 Reporting Systems for BBEVA Pupils

When safeguarding concerns arise, BBEVA will take into account the wishes and feelings of the child when deciding what action to take and what services to provide.

BBEVA recognises the importance of ensuring that pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, BBEVA will:

- Establish systems that enable pupils to report abuse with confidence;
- Ensure our reporting systems are well-publicised, easily understood, and accessible to pupils;
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely share their views and provide feedback;

BBEVA will ensure that every student is fully informed of the channels available for raising any safeguarding concerns or personal difficulties. To this end:

1. Designated Contacts
 - Students will be provided with the names and contact details of the DDSL and their assigned Advisors or Coordinators.
 - All the staff members remain accessible to students for any matters affecting their safety, well-being, or welfare.
2. "Student Worry Button"

- An online "[Student Worry Button](#)" will be prominently available via the website.
- Submissions made through this channel are routed exclusively to the safeguarding team and will not be visible to teaching or administrative staff.

3. Ongoing Awareness

- At induction and regular intervals thereafter, students will receive clear guidance on how and when to use these reporting channels.
- Information will be presented in age-appropriate language and reinforced through posters, digital reminders, and periodic safeguarding assemblies.

By maintaining transparent, confidential, and specialist-led reporting mechanisms, BBEVA ensures that all students know exactly who to approach—and how—to raise concerns safely and receive timely support.

12.13 Self-Reporting Statement

BBEVA recognises that staff members may occasionally find themselves in situations that could be misinterpreted, appear compromising to others, or, upon reflection, may not align fully with the expected standards of conduct.

BBEVA views self-reporting in such cases as a proactive and responsible action. It is an important mechanism for maintaining a culture of transparency, accountability, and safeguarding excellence across the company.

Self-reporting contributes to best safeguarding practice by:

- Allowing staff and volunteers to access timely support or resolve potentially difficult issues at the earliest opportunity;
- Demonstrating awareness of expected professional standards and personal insight into how actions may be perceived;
- Promoting a culture where all individuals strive to uphold the highest levels of integrity, behaviour and child protection.

BBEVA actively encourage all staff and any community members to self-report any situation which may appear compromising or be open to misinterpretation.

Upon receiving a self-report, the relevant safeguarding procedures will be followed,

beginning with an initial discussion with the individual to obtain a full understanding of the situation and determine any appropriate next steps.

13. Online Safety

1) Online Safety Measures

Given that providing online services, BBEVA place particular emphasis on online safety:

- Secure Platforms: Use secure, encrypted platforms for online teaching and meetings.
- Recording: All online classes will be recorded with prior parental consent, as a safeguard and for training purposes.
- Parental Involvement: Parents are encouraged to be present or supervise during online sessions, especially for younger children.
- Privacy Protection: Children and parents will be informed about privacy settings and how data is used during online interactions.
- Cyberbullying: Clear policies and procedures are in place to address any form of online bullying.

2) Specific Risks of Online Teaching

Online teaching presents unique risk factors:

Risk Category	Description
Geographical Isolation	Students and teachers are often physically distant, lacking in-person supervision.
Private Environments	Students may be in unsupervised settings, increasing the risk of inappropriate contact or harassment.
Platform Dependence	Misuse of screen sharing, private messaging, or social media may lead to privacy breaches.
Peer Interaction Risks	Cyberbullying, verbal abuse, and social exclusion may occur among peers.
Limited Help Channels	Students may struggle to find immediate adult support when

Risk Category	Description
for Children	distressed, with teachers potentially being their only point of contact.

3) Code of Conduct for Teachers: Six Key Safeguards for Student Protection

- All Classes Must Be Conducted and Recorded on Official Platforms
 - Classes must not be held on unauthorised platforms (e.g., personal Zoom accounts, WeChat, Line, etc.);
 - The platform must automatically record all sessions — teachers must not disable this function;
 - Recordings will be stored for no less than 30 days as reference for review and complaints.
- No Private Contact or One-on-One Communication with Students
 - Teachers must not communicate privately with students via WeChat, LINE, Instagram, or direct messaging;
 - All communication with students must occur through official platforms, academic emails, or approved channels;
 - If a student initiates a private message, the teacher must take a screenshot and report it to the administrator.
- Create a “Safe Classroom” Environment
 - On the first day of class, teachers must review the classroom code of conduct, stressing respect, attentiveness, and zero tolerance for mockery;
 - Open expression is encouraged, but any form of verbal abuse, racism, or gender-based offensive language is strictly prohibited;
 - Teachers must intervene immediately in case of student misconduct and complete a classroom incident report.
- Watch for Signs of Unusual Behaviour or Emotional Distress

Teachers should be able to recognise basic signs that a student may be experiencing abuse or distress, including but not limited to:

Observation	Possible Implication
Emotional instability, silence, or avoidance	Possible abuse or social isolation at home or school
References to violence or threatening language	Risk of self-harm or exposure to violence
Sleep issues, frequent absences	Unstable learning environment or family conflict
Student discloses private traumatic experiences	Student sees teacher as a trusted adult — requires formal response

Teachers are responsible for documenting and reporting such cases, not for resolving or verifying them independently.

4) Response Procedure: When a Student Makes a Disclosure

Teachers should follow the "4-Step Response Procedure" as outlined below:

- Listen: Stay calm, listen carefully without questioning, interrupting, or making judgments.
- No Confidentiality Promises: Inform the student:
"What you're saying is very important. I cannot promise to keep it confidential, but I will help you get the support you need."
- Record: Document the student's words, time, emotions, and context using neutral and concise language. Do not interpret or analyse.
- Report: Submit a *Safeguarding Incident Report Form* to the DSL within 24 hours.

5) Special Guidelines for Group and Interactive Classes

To prevent peer-on-peer abuse, all group-based interactive classes must implement the following measures:

- Teachers must apply proactive classroom management techniques to prevent insults, exclusion, or teasing among students.
- Disable unnecessary private messaging functions between students to avoid unsupervised interactions during or outside class.
- If verbal conflict arises between students, the teacher should:
 - Immediately stop the argument during class;

- Provide individual guidance after class;
- If harm has occurred, record the incident truthfully and report it.

This section outlines BBEVA's approach to online safety. For comprehensive details, please refer to BBEVA's *E-Safety Policy*.

6) Notifying Parents or Carers

Where appropriate, BBEVA will discuss any concerns about a child with their parents or carers. The DSL is usually responsible for this when a suspicion or disclosure arises.

Other staff members must only speak to parents or carers about such concerns after consulting with the DSL.

If the DSL believe that notifying parents or carers may increase the child's risk, BBEVA will discuss the matter with the child's local authority and children's social care team before doing so.

In cases involving allegations of abuse against another child, the parents or carers of all children involved will usually be notified. BBEVA will carefully consider what information to share about other children involved and when to share it. The DSL will work with the police and/or the local authority's children's social care department to ensure our information-sharing approach is consistent and appropriate.

The DSL will work with any relevant agencies (as determined by the case) to:

- Meet with the victim's parents or carers and the victim, to discuss the measures in place to keep them safe and to understand their wishes regarding support and how to proceed with the report.
- Meet with the alleged perpetrator's parents or carers, to discuss the support available to them and the measures being implemented (such as removing the child from the same class as the victim), including the reasoning behind these decisions.

14. Managing Allegations

If an employee or contractor is accused of abusing or mistreating a child, BBEVA will immediately initiate the following investigation procedures:

- Immediate Suspension: The individual in question will be immediately suspended from any work involving contact with children during the

investigation, to ensure the child's safety.

- Thorough Investigation: A comprehensive internal investigation will be conducted, in full cooperation with relevant external agencies (e.g., police, local authority children's services).
- Disciplinary Action: If the allegation is substantiated, appropriate disciplinary action will be taken in accordance with BBEVA's policy and relevant law, including but not limited to dismissal.
- Support: Support will be provided to the affected child and their family, and the accused employee will be treated fairly in terms of due process.

14.1 Complaints Against Staff

Complaints made against staff that may require a child protection investigation will be handled in accordance with our procedure for managing allegations of abuse against staff (see Appendix 1).

14.2 Other Complaints

BBEVA has a separate *Complaints Policy*, which outlines how BBEVA:

- Handle concerns and complaints promptly, courteously, respectfully, and confidentially
- Ensure complaints are addressed fairly and appropriately
- Keep complainants informed about the progress of their complaint
- Provide explanations and/or apologies when concerns are upheld
- Learn from concerns and complaints to improve overall service quality
- Acknowledge and share any compliments received with the appropriate individuals

14.3 Record Keeping

BBEVA will maintain comprehensive records of all safeguarding concerns reported to it. Every concern, discussion, decision, and the reasons for those decisions will be documented in writing.

If in doubt about whether to record something, staff should consult the DSL.

The records will be detailed and accurate. They will include all concerns about a student, even if no immediate referral is necessary, and will explain the rationale for any decisions made and actions taken.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A record of actions taken, decisions made, and the outcome

Copies of any correspondence or minutes of meetings with the Local Safeguarding Partner (LSP), the school's DSL, or other external agencies will also be included in the child safeguarding file.

BBEVA will ensure that child records clearly indicate the existence of separate safeguarding documentation. Information will be shared only on a need-to-know basis to protect the student's safety.

Safeguarding records will be stored securely, separately from ordinary student files, in a password-protected file system accessible only to designated personnel. Records will be retained in accordance with our retention schedule.

Child safeguarding records are generally not subject to disclosure under data protection law. This means students and parents do not have an automatic right to view them. Any request to access such records by a student or parent should be referred to the DSL.

Child protection information will be stored and processed in accordance with the principles of the *Data Protection Act 2018*.

The data must be limited in purpose; adequate, relevant, and not excessive; accurate; kept no longer than necessary; processed in line with the rights of the data subject; and stored securely.

Non-confidential records should be easy to access and retrieve. Confidential information must be stored securely and only accessible to authorised or professionally relevant individuals.

Safeguarding records relating to individual children will be retained for a reasonable period after the child leaves.

If a child transfers to another institution or school and has or has had safeguarding concerns, the DSL will ensure that their child protection file is transferred securely and separately from the main student file as soon as possible.

Additionally, if the concern is serious or complex, and/or if children's social services are involved, the DSL will also liaise directly with the receiving school's or institution's DSL to ensure they are prepared to support the child.

15. Policy Review

This policy will be reviewed at least annually, or sooner if there are changes to relevant laws or regulations. The review will be led by the DSL and will take into account feedback from staff, parents, and children.

16. Contact Information

If you have any questions about this policy or any safeguarding concerns, please contact our Designated Safeguarding Lead (DSL):


Mr. Chris Davies

Ding Talk: ID-asn_oe76j1h9z

Email: chris.jdavies@live.co.uk

Tel: +44 7796756817

17. Appendices

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- **Appendix 1: Allegations and Concerns**
 - **Appendix 2: Specific Safeguarding Issues**
 - **Appendix 3: FAQs - Helpful information for Pupils?**
 - **Appendix 4A: Guidance Issued to All Staff Members, including Volunteers, and Contractors**
 - **Appendix 4B: Safeguarding Guidance for Host Families**
 - **Appendix 5: Safeguarding Incident Report Form**

Name of Policy: Child Safeguarding Policy

Last reviewed: July 2025

Owner of Policy: Mr. Chris Davies

Date of next review: July 2026 - or whenever changes necessitate.

Appendix 1: Allegations and Concerns

1. Allegations Made Against Staff

When an allegation of abuse or a concern is raised regarding a member of staff's behaviour towards a child, established procedures must be followed. It is rare for children to make entirely false or malicious allegations; however, misunderstandings and misinterpretations of events can occur, and children may also name an innocent person out of fear of disclosing the actual perpetrator.

BBEVA promotes a culture of ongoing vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour. Staff are encouraged to raise concerns with the Senior Leadership Team (SLT) where children's safety or wellbeing may be at risk. BBEVA recognises that it is vital for all staff to understand the relevant processes and procedures, so they are able to follow them if they have safeguarding concerns about a colleague. This enables the school to support staff as needed, help manage the safety and well-being of children, and provide information that may inform further action or procedural changes to protect the children in our care.

1) Reporting Concerns

Staff who have concerns about the conduct of a colleague towards students must remember that the welfare of the child is paramount. No staff member will suffer detriment for raising genuine concerns. All concerns must be raised via the appropriate channels:

- Allegations or concerns about staff should be reported directly to the DSL, or to the DDSL in the DSL's absence.
- Allegations or concerns about the DSL should be reported to the Chair of the Board of Directors.
- Staff may also report any allegation or concern directly to the police if they believe immediate action is required and the behaviour may constitute a criminal offence.
- Staff may also contact the NSPCC whistleblowing helpline at 0800 028 0285 if they feel their concerns have not been appropriately addressed through internal processes, even if they do not meet a criminal threshold.
- Allegations concerning former staff members no longer working at BBEVA should be referred to the police.

Concerns may initially be reported verbally, but should be followed up with a dated

and timed written record detailing what was disclosed, observed, said, or done.

It is crucial that expressions of concern are reported even if they do not constitute a formal "allegation," particularly where such concerns or questionable behaviours are repeated. Concerns may also be raised by third parties. Repeated reports may reveal a pattern of unacceptable behaviour.

BBEVA will act on any allegation that a person working with or in contact with children has:

- Behaved in a way that has harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Displayed behaviour raising concern about their suitability to work with children.

Where concerns fall below these thresholds, they will be addressed promptly and recorded in accordance with complaints procedures to monitor potential patterns of misconduct.

2) Responding to Concerns

The full procedure and statutory guidance for handling allegations against staff are found in *Keeping Children Safe in Education* (KCSIE, DfE, September 2023).

Staff and parents must not investigate the matter themselves, make assumptions or provide alternative explanations, nor promise confidentiality to any alleged victim.

Upon receiving a concern, the case manager (either the DSL, the DDSL, or in their absence, the CEO) will take the following steps:

- Record the concern with the date and time if not already documented, detailing what was disclosed, observed, said, or done.
- Inform the Local Authority Designated Officer (LADO) on the same day and send copies of relevant documents related to the allegation.
- If the report is made to the DSL or the DDSL, the other must be informed the same day. If the DDSL receives the report in the absence of the DSL, the DSL must be informed the same day upon return.
- The DSL/DDSL may request clarification of the allegation or its circumstances but must not investigate.
- Liaise with the LADO and cooperate with any relevant agencies; if no further action is taken by those agencies, consider employment matters and potential disciplinary procedures.

The *Education Act 2011* prohibits the publication of information that could lead to the identification of a teacher who is the subject of an allegation. "Publication" includes oral, written, and online content. BBEVA will comply with this law at all times.

3) Managing Allegations

When an allegation is received, the case manager will immediately discuss the matter with the LADO. The initial discussion aims to assess the nature, context, and seriousness of the allegation and agree on a course of action. During this process, the case manager and LADO will:

- Share all available information, including from the source and personnel records;
- Identify any additional information required;
- Consider whether the accused should continue working or remain in contact with students;
- Consider whether suspension is appropriate;
- Decide what information or advice the case manager should receive, including whether the staff member should be informed;
- Determine what action is needed, and who needs to be involved or informed (e.g., DBS and/or Teaching Regulation Agency [TRA]).

The course of action will be tailored to the individual case, prioritising the safety of children while respecting the staff member's right to confidentiality and a timely resolution. All decisions will be subject to risk assessment and aligned with guidance from the LADO and/or police.

If deemed necessary, a strategy meeting will typically be convened by social services, involving the LADO, police, and BBEVA's representatives (e.g. DSL/DDSL or CEO).

Three possible actions may follow:

- A criminal or joint investigation involving the police and children's social care, potentially leading to legal action;
- A disciplinary investigation;
- Internal resolution by BBEVA.

Possible outcomes:

Substantiated, Malicious, False, Unsubstantiated, or Unfounded.

For the definitions of harm threshold, the classification of investigation outcomes, and procedures for DBS/TRA referrals, refer to Section 12, “If You Have a Concern About a Staff Member, Volunteer, Homestays or Contractor”.

If police and social services decide not to pursue the case, BBEVA will still consider whether any further internal investigation or action is necessary. Where appropriate, a disciplinary hearing will be convened, which may result in dismissal.

Where a criminal investigation concludes with no charge or prosecution, or following acquittal, the case manager will consult with the LADO to determine next steps. This may involve further internal action and the sharing of agency information.

If a disciplinary investigation is required, it must follow BBEVA’s disciplinary procedures. Settlement agreements (in which an employee agrees to resign in return for no disciplinary action and agreed references) will not be used in these circumstances.

4) Supporting Those Involved

Every effort will be made to maintain confidentiality and prevent publicity during the investigation. Information will only be shared with those who need it to protect children, facilitate the investigation, or manage disciplinary procedures.

BBEVA has a duty of care to its employees. Effective support will be provided to any employee facing an allegation, and a named contact will be appointed if the staff member is suspended. Social contact with colleagues will not be prevented unless it risks compromising the investigation.

Where appropriate, the student’s parents/guardians will be informed at the earliest opportunity. They will be kept up to date with the case’s progress and the outcome, even where there is no criminal prosecution. However, such disclosure should not take place without prior consultation with relevant agencies. This includes outcomes of any disciplinary hearings, although details of proceedings and evidence will not usually be disclosed.

5) Action Upon Conclusion of a Case

BBEVA will refer to the Disclosure and Barring Service (DBS)—after consulting the Local Authority Designated Officer (LADO)—any individual who has been dismissed (whether paid or unpaid) from regulated activity, or who would have been dismissed or removed had they not resigned or otherwise ceased to provide services, and whom BBEVA believes has harmed, or attempted to harm, or encouraged or facilitated others to harm, a child, or placed a child at risk of harm, or whom BBEVA

has reasonable cause to believe has committed any of the offences specified in the *Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009*.

For these purposes, "removed" includes dismissal, non-renewal of a fixed-term contract, ceasing to use agency or supply staff, ending placements for trainees or volunteers, not using contracted staff, or the individual voluntarily leaving any of these roles.

If the suspended individual is to return to work, BBEVA will consider how to support their reintegration. Many will benefit from a phased return and/or mentoring. BBEVA will also consider how best to manage contact with the student who made the allegation, if still enrolled.

If an allegation is found to be false, the case manager may refer the matter to children's services to assess the child's needs or risk of abuse.

Where an allegation is shown to have been deliberately fabricated or malicious, the DSL will consider appropriate disciplinary action against the student who made it.

If a teacher is dismissed—or would have been had they not resigned—and a prohibition order may be appropriate, the matter will be referred to the Teaching Regulation Agency (TRA). This may apply in cases of unacceptable professional conduct, conduct likely to bring the profession into disrepute, or a relevant criminal conviction.

At the conclusion of any case, the DSL (in consultation with the LADO) will review the circumstances to determine whether any procedural improvements are necessary to prevent future incidents. This includes examining the use and length of suspensions and whether they were appropriate. Lessons may also be learned about whether such investigations could proceed without suspension in future cases.

For all other outcomes (unfounded, false, malicious, or unsubstantiated), the case manager (and the LADO if involved) will consider the facts and whether lessons can be learned or improvements made.

6) Record Keeping

All allegations and concerns about staff (along with relevant documents) will be securely held by the DSL or the DDSL in the DSL's absence, separate from personnel and student files. Access will be limited to the DSL, DDSL, and any designated HR representatives or officers involved in the case. The only exception is where the allegation is found to be malicious; in such cases, all records will be removed from

the staff member's file.

These records may be helpful for future DBS disclosures, particularly where police provide non-conviction information. They also prevent unnecessary reinvestigation of recurring allegations. Records will be retained until the staff member reaches normal retirement age, or for 10 years from the date of the allegation, whichever is longer. False, unsubstantiated, or malicious allegations will not be included in references.

If a concern has been raised about a staff member who later moves to another organisation, the DSL will consider whether the concern should be shared with the new employer or institution.

The DSL will also pass on any relevant concerns or allegations affecting students to their next school, where applicable.

2. Low-Level Concerns

As part of BBEVA's safeguarding approach, we promote a culture of openness and transparency where all concerns about any adult working for or on behalf of BBEVA—including supply staff, volunteers, and contractors—are dealt with promptly and appropriately. BBEVA is committed to ensuring that suitable actions are taken in a timely manner to safeguard children and to embed a consistent approach to addressing concerns across BBEVA.

It is essential to foster a culture in which any concern about an adult is responsibly shared with the appropriate person, properly recorded, and dealt with appropriately. Doing so should:

- Encourage a culture of openness and transparency;
- Enable BBEVA to identify inappropriate, problematic, or concerning behaviour at an early stage;
- Minimise the risk of abuse;
- Ensure that adults working for or on behalf of BBEVA understand and maintain professional boundaries, acting in line with our mission and values;
- Protect those working for or on behalf of BBEVA from the potential harm of false low-level concerns or misunderstandings, through fair and effective handling.

The term "low-level" does not mean that the concern is insignificant. A low-level concern

refers to any concern—no matter how small, even if it only gives rise to a sense of unease or a “nagging doubt”—that an adult working for or on behalf of BBEVA may have acted in a way that:

- Is inconsistent with the staff code of conduct, including behaviour that occurs outside of work; and
- Does not meet the threshold for harm, or is otherwise not serious enough to consider a referral to the Local Authority Designated Officer (LADO).

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

- Being overly friendly with students;
- Having favourites among students;
- Taking photos of students on a personal mobile phone, contrary to BBEVA's policy;
- Having one-to-one contact with a student outside the expected scope of their role; or
- Humiliating students.

Such behaviour can exist on a wide spectrum, ranging from inadvertent or thoughtless actions, or behaviour that may appear inappropriate but is not in certain contexts, to acts that may ultimately be intended to enable abuse.

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

Reporting Low-Level Concerns

All low-level concerns must be recorded in writing. The record should include specific details of the concern, the context in which it arose, and any actions taken in response. The name of the individual raising the concern should also be documented. If the individual wishes to remain anonymous, their preference should be respected as far as possible.

BBEVA is committed to ensuring that all such records are treated as confidential, securely stored, and handled in accordance with the *Data Protection Act 2018* and the *UK General Data Protection Regulation (UK GDPR)*.

Records should be reviewed regularly to identify any patterns of concerning, inappropriate, problematic, or worrying behaviour. Where such patterns are identified, BBEVA will take appropriate action in line with its disciplinary procedures. If the pattern

escalates to the level of meeting the harm threshold, it will be referred to the Local Authority Designated Officer (LADO) as set out in this policy.

Consideration should also be given to whether the behaviour indicates a wider cultural issue within BBEVA that requires attention. Where appropriate, policies may be revised and additional training provided to reduce the risk of recurrence.

It is recommended that such records be retained for a minimum period up to the point at which the individual leaves BBEVA, though the retention period may be determined in accordance with the circumstances of each case.

3. Allegations Against Outside BBEVA

A. Scope

This policy applies to any external organisations, contractors, volunteers, homestay providers, and their household members who engage with students at BBEVA's venues, school events, or during guardianship services, but who lie outside BBEVA's direct management structure.

B. Immediate Reporting & Initial Action

a) Receipt of an Allegation

- Any staff or other personnel who receives an allegation that an external organisation or individual may pose a risk to a student's safety or welfare must report it without delay to the DSL.

b) Emergency Protection Measures

- If an allegation concerns an activity in progress or an event occurring, all involvement by the external party in question must be suspended immediately to safeguard students.

C. Notification & Collaborative Investigation

a) Notify Local Authorities

- Regardless of any internal preliminary assessment, the allegation must be reported as soon as possible to the Local Authority Designated Officer (LADO), relevant social services, and the police if it involves a potential criminal offence.

b) Liaison with the External Party

- Inform the management or representative of the external organisation or individual about the nature of the allegation and the protective measures BBEVA

has taken, and request their full cooperation with the investigation.

c) Multi-Agency Coordination

- The DSL will convene an urgent meeting with representatives of the external party, the student's parents, and the relevant local authority officers to agree on an investigation plan, data-sharing protocols, and next steps.

D. Investigation & Evidence Preservation

a) Parallel Internal and External Inquiries

- BBEVA will conduct an initial fact-finding review while fully respecting and supporting any statutory investigation by local authorities.

b) Evidence Preservation

- All relevant evidence—such as premises, items, electronic records, and other materials—must be preserved, documented, and, if necessary, photographed or securely stored to ensure integrity.

c) Witness Protection

- Provide appropriate support and confidentiality for whistle-blowers, affected students, and witnesses to prevent retaliation or secondary harm.

E. Decision-Making & Follow-Up Actions

a) Outcome Determination

- Upon conclusion of the investigation, the DSL and the Board of Governors will review the findings from both statutory and internal inquiries to decide whether to continue, suspend, or terminate the external party's engagement with BBEVA.

b) Student Re-Accommodation

- If the allegation involves a homestay provider, BBEVA will arrange alternative temporary accommodation for the student during the investigation. If the external party is a tutor or instructor, BBEVA will assign alternative teaching support.

c) Parent Communication

- Keep the student's parents fully informed of the investigation's progress and any agreed-upon safeguard measures.

F. Record-Keeping & Policy Review

a) Comprehensive Documentation

- All allegations, reports, investigative actions, meeting minutes, and decisions must be recorded in the student's safeguarding file.

b) Policy Evaluation

- After each case, the DSL and the Board of Governors will review the handling of the incident to assess policy and procedural effectiveness and make any necessary revisions.

G. Confidentiality & Transparency

- Sensitive information will be shared only on a "need-to-know" basis, in full compliance with GDPR and applicable UK child protection legislation.
- BBEVA will ensure timely and accurate communication with all stakeholders (parents, school leadership, local authorities, and partner organisations) to maintain trust and prioritise student welfare.



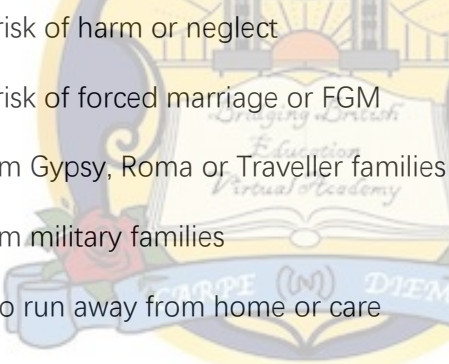
Appendix 2: Specific Safeguarding Issues

All staff should be aware of the following specific safeguarding issues. These issues are based on the legal and social context of the United Kingdom. For children located outside the UK, BBEVA recognises that definitions of safeguarding concerns and the support available may differ. BBEVA follow the principles of the United Nations Convention on the Rights of the Child to ensure that our approach to every student is consistent with their respective legal and social frameworks.

1. Children Who Are Absent From Education

Children being absent from education, particularly on a repeated basis, may be an indicator of a range of safeguarding concerns. These may include abuse or neglect—such as sexual abuse or exploitation, child criminal exploitation—or issues such as mental health difficulties, substance misuse, radicalisation, female genital mutilation (FGM), or forced marriage.

There are many circumstances that may cause a child to be absent from or missing education, but some children are at particularly high risk, including:

- 
- Children at risk of harm or neglect
 - Children at risk of forced marriage or FGM
 - Children from Gypsy, Roma or Traveller families
 - Children from military families
 - Children who run away from home or care
 - Children supervised by the youth justice system
 - Children no longer in school
 - Children from newly arrived migrant families

BBEVA will follow procedures for dealing with unauthorised absence and children missing education, especially on repeat occasions, to help identify the risk of abuse and neglect (including sexual exploitation) and to prevent the risk of future missing episodes.

Staff will be trained to understand the signs to look for and the individual triggers to be aware of when considering the potential safeguarding risks that may be associated with a child's absence from education (such as travel to conflict zones, FGM, or forced marriage).

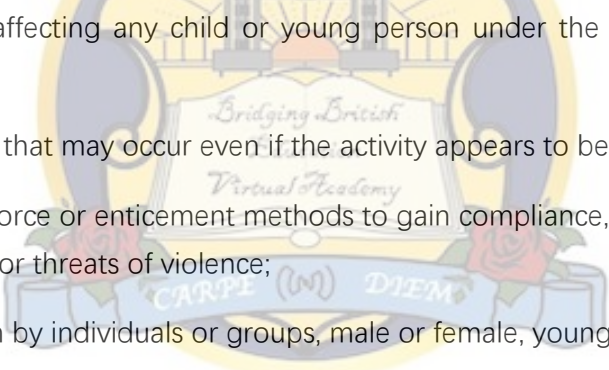
If staff have concerns or suspect that a child is suffering, or likely to suffer, from harm or neglect, they will follow the procedures outlined in Section 12 of this policy, including

discussing concerns with the DSL or the DDSL in the absence of the DSL. The DSL/DDSL will follow procedures, including making reasonable enquiries. Where there is a risk of harm, or if a child is in immediate danger, a referral will be made without delay to the local authority children's social care team and the police.

2. Child Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are both forms of abuse that occur when individuals or groups use an imbalance of power to coerce, manipulate, or deceive children into participating in sexual activities or criminal acts in exchange for something the victim needs or wants, and/or for the economic benefit or status of the perpetrator or facilitator, and/or through violence or threats of violence. Both CSE and CCE can affect boys and girls and may involve children being moved for exploitation purposes (commonly referred to as trafficking).

Staff recognise that child criminal exploitation is a geographically widespread form of harm characterised by:

- 
- Potentially affecting any child or young person under the age of 18 (male or female);
 - Exploitation that may occur even if the activity appears to be consensual;
 - The use of force or enticement methods to gain compliance, often accompanied by violence or threats of violence;
 - Perpetration by individuals or groups, male or female, young people or adults;
 - A power imbalance favoring the exploiter. While age may be the most apparent factor, this imbalance can also arise from various other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Specific forms of CCE may include children being forced or manipulated into transporting drugs or money (often via "County Lines"), working in cannabis factories, shoplifting or pickpocketing. They may also be coerced or manipulated into committing vehicle crime or threatening/inflicting serious violence on others. Children may become trapped in this exploitation because perpetrators threaten violence against the victim (and their family), manipulate or coerce them into debt bondage. They may be forced to carry weapons such as knives, or begin carrying knives as a means of protection from harm by others.

Because children involved in criminal exploitation often commit crimes themselves, their

vulnerability as victims is not always recognised by adults and professionals (especially older children), and despite being harmed, they are not always seen as victims. Even if the activity appears consensual, they may still be subject to criminal exploitation. It is important to note that girls' experiences of criminal exploitation may differ significantly from those of boys. Signs may vary, but staff should be aware that girls are also at risk of criminal exploitation. It is equally important to recognise that both boys and girls who experience criminal exploitation face an increased risk of sexual exploitation.

Guidance on child criminal exploitation is available in [Child Criminal Exploitation and Vulnerable Adults](#). This guidance outlines signs of potential victims and appropriate responses. It supplements existing safeguarding policies and aims to help identify and protect individuals exploited through such criminal activity.

If staff are concerned that a student is involved in criminal exploitation, they should report this to the DSL, or to the DDSL (Deputy DSL) in the DSL's absence. The DSL/DDSL will consider referring the case through the UK's National Referral Mechanism or the equivalent mechanism overseas.

3. Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of sexual abuse which may involve physical contact, including penetrative acts (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothes. It may also involve non-contact activities such as encouraging children to participate in the production of sexual images, forcing children to watch sexual images or activities, encouraging inappropriate sexual behaviour, or grooming children for abuse (including via the internet).

CSE occurs when individuals or groups use an imbalance of power to coerce, manipulate, or deceive children or young people under 18 into sexual activities in exchange for something the victim needs or wants, and/or for the economic benefit or status of the perpetrator or facilitator. Even if the sexual activity appears consensual, the victim may still be sexually exploited.

CSE may be ongoing or a one-off event and can occur without the child's knowledge, for example through others sharing their videos or images on social media. It can affect any child coerced into sexual activity, including those aged 16 or 17 who can legally consent to sexual activity. Some children may not realise they are being exploited, believing they are in a genuine romantic relationship.

Many exploited children at some point run away from home, leave care, or become absent from school. Some possible indicators include:

- Possession of unexplained gifts or new items;
- Association with other young people involved in exploitation;
- Contracting sexually transmitted infections;
- Misuse of drugs or alcohol;
- Frequent absences from school or disengagement from education.
- Exclusion or unexplained absences from school, college, or work;
- Going missing from home or care, frequently or for extended periods;
- Receiving large numbers of texts or phone calls;
- Displaying age-inappropriate sexual behaviour or having sexually transmitted infections;
- Evidence or suspicion of physical or sexual assault;
- Relationships with controlling individuals or groups, often significantly older;
- Multiple callers (unknown adults or peers);
- Frequenting known locations associated with sexual exploitation;
- Concerning behaviour online or on social media;
- Increasingly secretive behaviour or reluctance to disclose;
- Self-harm or significant changes in emotional wellbeing.

Although the above vulnerabilities may increase the risk of CSE, not all children who show these signs are being exploited.

Child sexual exploitation is a serious crime that can have long-lasting detrimental effects on a child's physical and emotional health. It may also be linked to child trafficking.

All staff receive safeguarding training to recognise signs of sexual exploitation, and any concerns should be reported immediately to the DSL or, in their absence, the DDSL.

4. Child-on-Child Abuse

Child-on-child abuse refers to abuse perpetrated by children against other children. This can happen both on and off BBEVA premises and may occur in face-to-face and online environments.

BBEVA takes a zero-tolerance approach to sexual violence and sexual harassment. BBEVA recognises that the absence of reports does not mean such abuse is not happening.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (sometimes referred to as 'teenage relationship abuse');
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (which may include online elements that facilitate, threaten and/or encourage physical abuse);
- Sexual violence such as rape, assault by penetration, and sexual assault (which may include online elements that facilitate, threaten and/or encourage sexual violence);
- Sexual harassment such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery);
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause humiliation, distress, or alarm;
- Initiation/hazing violence and rituals (which may include harassment, abuse or humiliation used as a way of welcoming someone into a group and may also include online elements).

When children abuse peers online, this may include, for example, sending abusive, harassing, and misogynistic messages; sharing indecent images consensually or non-consensually in chat groups; and sharing abusive images and pornography to those who do not want to receive such content.

When considering harmful sexual behaviour between children, BBEVA takes into account their ages and developmental stages. BBEVA acknowledges that children who display harmful sexual behaviour often have themselves experienced abuse and trauma and will provide them with appropriate support.

If staff have any concerns about child-on-child abuse, or receive reports from children, they will follow the procedures set out in Section 12 of this policy.

5. Domestic Abuse

Children may witness domestic abuse and/or violence and be adversely affected by it. Such abuse or violence occurs between family members. In some cases, children may blame themselves or may have to leave the family as a result.

Types of domestic abuse include intimate partner violence, abuse between family members, adolescent relationship abuse (abuse within intimate personal relationships between children), and violence or abuse by children/young people towards parents. It can be physical, sexual, financial, psychological, or emotional. It also includes non-physical abuse as well as witnessing others being mistreated — for example, all forms of domestic abuse can have an impact on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, race, socioeconomic status, sexual orientation, or background. Domestic abuse can occur within or outside the family. Children who witness domestic abuse are also victims.

Older children may also experience or perpetrate domestic abuse and/or violence in their own relationships. This may include sexual harassment.

Exposure to domestic abuse and/or violence can have serious, long-lasting emotional and psychological effects on children and can affect their health, well-being, development, and ability to learn.

If the police are called to a domestic abuse incident and there are children at the residence who have experienced the incident, the police will notify a key adult at the school (usually the DSL) before the child arrives at school the next day. This procedure is part of the [*Operation Encompass*](#) programme involving the police.

If staff have any concerns about domestic abuse or receive reports from children, they will follow the procedures set out in Section 12 of this policy.

The DSL will provide support based on the child's needs and will update records relating to their situation.

6. Gang Involvement and Criminal Activity

Staff should be alert to indicators that a child may be at risk from, or involved in, serious

violent crime, either through gang involvement or as a victim of gang violence. These may include:

- Becoming estranged from family;
- Changes in friendships or relationships with older individuals or groups;
- Sudden loss of interest in school — decline in attendance or academic performance;
- Use of new or unfamiliar slang;
- Possession of unexplained money or goods;
- Staying out late without explanation;
- Sudden changes in appearance, including wearing particular styles or “uniforms”;
- New nicknames;
- Signs of assault or unexplained injuries;
- Increased use of social media;
- Adoption of group behavior codes, such as ways of speaking and gestures;
- Expressing aggressive or intimidating views towards other youth groups, some of whom may have been friends in the past;
- Fear of going into certain areas or concern about unfamiliar youths appearing in the community.

Staff need to be able to recognise these signs and indicators and share concerns immediately with the DSL or, if the DSL is absent, with the Deputy DSL. The DSL/DDSL will usually consult with the child's parents. If the child is in the UK, the DSL/DDSL will contact the local authority's children's social care or police where the child currently resides. For children overseas, an equivalent organisation may be sought.

7. Homelessness

Homelessness or the risk of homelessness poses a real threat to a child's well-being.

The DSL will be aware of the local housing authority's contact details and referral routes so that concerns can be raised or followed up at the earliest appropriate time and in line with local procedures.

If the child has suffered harm or is at risk of harm, the DSL will also make a referral to

children's social care.

8. Honour-Based Violence (including FGM and Forced Marriage)

So-called "Honour-Based Abuse" (HBA) refers to crimes or incidents committed to protect or defend the honour of the family and/or community. This includes Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse within this context usually involves a wider network of family or community pressure and may involve multiple perpetrators.

All forms of HBA are abuse and will be treated and escalated accordingly. All staff will remain alert to the possibility that a child may be at risk of or already experiencing HBA. If staff have concerns, they will discuss these with the DSL, who will initiate safeguarding procedures.

8.1 FGM (Female Genital Mutilation)

The DSL will ensure staff receive appropriate training to identify children affected by or at risk of FGM.

Section 12 of this policy outlines procedures for staff if they discover or suspect a student is at risk of or has undergone FGM.

Signs that FGM has already occurred include:

- The student discloses to a professional that FGM has been carried out.
- A mother or family member discloses that FGM has been performed.
- The family/student is known to social services for other safeguarding concerns.
- The girl:
 - Has difficulty walking, sitting, or standing or appears uncomfortable.
 - Finds it difficult to sit still for long periods (if this was not previously an issue).
 - Spends longer than usual in the bathroom or toilet due to urination difficulties.
 - Suffers from frequent urinary, menstrual, or stomach problems.
 - Avoids physical exercise or misses PE classes.
 - Has repeated or prolonged absences from school.

- Exhibits increased emotional or psychological needs, e.g., withdrawal or depression, or significant behaviour changes.
- Is unwilling to undergo any medical examinations.
- Seeks help but does not clearly disclose the problem.
- Talks about pain or discomfort between her legs.

Potential indicators that a student may be at risk of FGM include:

- The girl's family has a history of FGM (the single biggest risk factor).
- FGM is known to be practiced in the girl's community or country of origin.
- Parents or family members express concern that FGM may be carried out.
- The family does not engage with professionals (health, education, or others) or is known to social services for other safeguarding issues.
- The girl:
 - Has a mother, older sister, or cousin who has undergone FGM.
 - Has limited integration into UK society.
 - Discloses to professionals that she will undergo a "special procedure" or attend a "becoming a woman" ceremony.
 - Talks about going abroad to a country where FGM is common, or parents/carers plan to take her overseas for an extended period.
 - Requests help from teachers or other adults because she knows or suspects she is at immediate risk of FGM.
 - Discusses FGM in conversation (e.g., telling other children, although context is important).
 - Has unexplained absences.
 - Has missing parts in her "red book" (child health record) and/or visits a travel clinic or similar for vaccinations/anti-malarial medication.

These indicators and risk factors are not exhaustive.

8.2 Forced Marriage

Forcing someone to marry is a criminal offence. A forced marriage is one entered into without the full and free consent of one or both parties and involves violence, threats, or any other form of coercion. Threats can be physical, emotional, or

psychological.

It is also illegal for anyone under 18 to marry, even if violence, threats, or coercion are not involved.

Staff will receive training about forced marriage and its signs. BBEVA recognises the One Chance rule, meaning that may only have one opportunity to speak to a potential victim and one chance to save them.

If staff suspect a student is being forced into marriage, they should discuss their concerns privately and safely with the student and then report this to the DSL.

The DSL will:

- Discuss concerns with the student in a safe, private space.
- Initiate local safeguarding procedures and refer the case to the designated local authority officer.
- Seek advice from the Forced Marriage Unit, phone 020 7008 0151 or email fm@fco.gov.uk.
- Refer the student, as appropriate, to education welfare officers, pastoral staff, learning mentors, or school counsellors.

9. Looked-After Children and Private Fostering

Looked-after children are those who are cared for by local authorities, subject to care orders, or placed voluntarily by local authorities (often as a result of abuse or neglect). All staff should understand how to safeguard looked-after children. When staff are responsible for a looked-after child, they will receive the necessary information related to the child's legal status, care arrangements, and the level of authority delegated by the local authority to the carers. The DSL is responsible for all matters concerning looked-after children and holds and liaises with the child's social worker's details.

Private fostering refers to arrangements where a parent places their child (under 16, or under 18 if disabled) to live with someone who is not a close relative (such as an aunt, uncle, grandparent, sibling, or stepparent) for more than 28 days. The person caring for the child is called a private foster carer. BBEVA has a legal duty to notify the relevant local authority if it becomes aware of any private fostering arrangements in the UK or suspects a child is in such an arrangement. The local authority will then check if the child is safe and well cared for and that the accommodation and care provided are satisfactory.

10. Preventing Radicalisation

- Radicalisation refers to the process by which a person begins to support terrorism and extremist ideologies associated with terrorist groups.
- Extremism means vocal or active opposition to fundamental British values such as democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs. This includes calls for the death of members of the armed forces.
- Terrorism involves:
 - Acts that cause or threaten serious violence to people;
 - Serious damage to property; or
 - Serious disruption or destruction of electronic systems.

Use or threat of terrorism must be intended to influence the government or intimidate the public, advancing a political, religious, or ideological cause.

BBEVA has a duty to prevent children from being drawn into terrorism. The DSL will receive Prevent awareness training and ensure staff receive appropriate training to identify children at risk.

BBEVA assess the risk of our students being drawn into terrorism, based on local risks, and in partnership with safeguarding partners and local police.

There is no single way to identify a person vulnerable to extremist ideology; radicalisation can happen quickly or over a long time. Staff will be alert to changes in students' behavior.

Government and charity resources such as the [\[Education Against Hate\]](#) website and the [NSPCC](#) highlight possible signs of radicalisation including:

- Refusal to interact with peers different from themselves or verbal abuse toward them;
- Susceptibility to conspiracy theories and feelings of persecution;
- Changes in friend groups or appearance;
- Abandoning previously enjoyed activities;
- Conversion to a new religion;
- Isolation from family and friends;
- Speaking in a scripted way;

- Reluctance or inability to discuss their views;
- Sudden disrespectful attitudes toward others;
- Increased anger;
- Increased secrecy, especially online;
- Expressing sympathy for extremist ideologies or groups;
- Accessing extremist material online, including on social media;
- Possession of extremist literature;
- Contact with extremist recruiters and attempts to join extremist organizations.

Children at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. These signs can also be normal teenage behaviour—staff should trust their instincts and seek advice if concerned.

If staff have concerns, they will follow the procedures outlined in Section 12 of this policy, including discussing concerns with the DSL.

For students in the UK, the DSL/DDSL may refer to the “Channel” programme, which supports individuals vulnerable to radicalisation early. For overseas students, an equivalent organisation may be identified.

Staff should always act on concerns.

Further details on BBEVA’s Prevent measures are in other BBEVA policies.

Non-urgent advice for staff can be obtained via the DfE helpline at +44 (0)20 7340 7264 or email counter-extremism@education.gsi.gov.uk.

11. Sexual Violence and Sexual Harassment Between Children

Sexual violence and harassment can occur:

- Between children of any age and gender;
- In groups where one or more children sexually assault or harass one or more others;
- Online and face-to-face (including physical and verbal).

Sexual violence and harassment exist on a continuum and may overlap.

Children who experience sexual violence or harassment are likely to find it stressful and distressing. This can negatively impact their educational outcomes, especially if the

alleged perpetrator attends the same school.

If a victim reports an incident, staff must reassure them that they are being taken seriously, supported, and protected. Victims should never feel that reporting abuse or neglect is causing trouble or that they should feel ashamed.

When supporting victims, staff will:

- Reassure them that laws around child-on-child abuse are meant to protect them, not to criminalise them.
- Regularly review decisions and actions and update policies based on lessons learned.
- Watch for problematic or concerning behaviour patterns and decide on appropriate action if such patterns are identified.
- Consider whether a wider cultural issue within BBEVA is allowing inappropriate behaviour to occur and whether policy updates or additional staff training could minimise recurrence risks.
- Stay vigilant and sensitive to the challenges of identifying signs of sexual violence in children and their needs.

Certain groups are at greater risk, including girls, children with special educational needs and/or disabilities, and lesbian, gay, bisexual, and transgender (LGBT) children.

Staff should understand the importance of:

- Challenging inappropriate behaviour;
- Clearly stating that sexual violence and harassment are unacceptable, never tolerated, and not an inevitable part of growing up;
- Challenging physical behaviours that may be criminal, such as grabbing bottoms, breasts, genitals, pulling down trousers, flicking bras, or lifting skirts. Ignoring such behaviour normalises it.

If staff have concerns or receive disclosures of sexual violence or harassment, they will follow the procedures in Section 12 of this policy.

12. Serious Violence

Indicators that a child may be at risk of or involved in serious violent crime include:

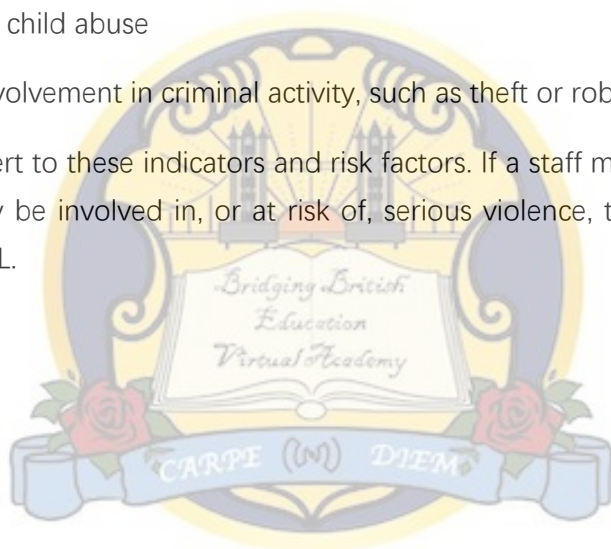
- Increased absences from school or the classes

- Changes in friendships or associations with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm or noticeable deterioration in physical or mental health
- Evidence of being assaulted or unexplained injuries
- Unexplained gifts or new possessions (which may indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs, and may be at risk of criminal exploitation – see above)

Risk factors that increase the likelihood of involvement in serious violence include:

- Being male
- Frequent school absences or permanent exclusion
- A history of child abuse
- Previous involvement in criminal activity, such as theft or robbery

Staff will remain alert to these indicators and risk factors. If a staff member is concerned that a student may be involved in, or at risk of, serious violence, they will report their concerns to the DSL.



Appendix 3: FAQs - Helpful information for Pupils

Problems or Worries? Who to Ask for Help

If you have any problems or worries, please remember you are not alone! We are always here to help and support you.

We understand that there may be times when you feel worried or upset about something. The information below explains who you can talk to so that you can choose someone you trust. Many students have found that, no matter how serious a problem may seem, talking about it almost always helps a great deal.

Is Something Worrying You?

Here are some examples of situations that might cause concern for young people:

- You think you may be ill but are too afraid or embarrassed to tell anyone;
- You feel depressed or that life is not worth living;
- You or your friends are being bullied or treated unkindly by another student;
- You suspect another student is not eating properly or may be harming themselves;
- You feel worried, angry, or hurt about something that happened at your Host Family's home;
- You think another student has done, or is about to do, something seriously wrong or dangerous;
- You are caught in a difficult situation that you don't know how to escape from, such as one involving drugs, alcohol, money, or sex;
- You feel you are being treated unfairly because of your gender, race, religion, disability, learning difficulty, or because you may be lesbian or gay;
- You feel that a member of BBEVA staff or a Host Family member has treated you unfairly, for example, by giving an inappropriate punishment or showing favouritism to other students;
- You feel you are not being given enough privacy or independence.

What Should You Do?

If any of these things happen, please talk to someone about it, even if you think you can

handle it yourself. The situation may also affect others, or you might not be aware of all the ways the problem can be resolved.

There are many people who will be happy to listen to you and help you find a solution. You may find it helpful to talk first with a trusted student friend. However, you may also need the help and support of an adult or professional, such as a member of BBEVA staff or a family member you trust most.

We would expect the first person you speak to be one of the following:

- Your parents, guardians, or other relatives;
- A trusted adult at your school, such as a Houseparent, Form Tutor, Head of Year, School Chaplain, Counsellor, or School Doctor;
- An older student at your school;
- Your BBEVA Student Advisor;
- Your Host Family;
- BBEVA's Designated Safeguarding Lead (DSL).

If you do not feel able to speak to any of the above, you can also contact:

- **NSPCC (National Society for the Prevention of Cruelty to Children):** 0800 800 5000 or visit www.nspcc.org.uk
- **Childline:** 0800 1111 or www.childline.org.uk

Who Else Needs to Know?

We understand that you may wish for your concerns to remain confidential. This may be possible if your concern does not raise a safeguarding issue. However, please note that many adults have a legal duty to share safeguarding concerns with their organisation (including your school or BBEVA) or with other agencies that can help.

Please do not let this stop you from speaking up. Most students who share their worries say afterwards that it helped them, and that the problem seemed much less serious once they had the chance to talk it through with someone experienced and supportive.

Appendix 4A: Guidance Issued to All Staff Members, including Volunteers, and Contractors

This guidance sets out the safeguarding responsibilities, expected standards of conduct, and operational requirements for all BBEVA staff members, volunteers, contractors, and homestay providers.

It must be read alongside:

- BBEVA's Safeguarding Policy
- Code of Conduct
- Whistleblowing Policy
- All applicable national and local safeguarding laws (including UK legislation, e.g., *Children Act 1989 and 2004, Working Together to Safeguard Children, Keeping Children Safe in Education*).

Compliance is mandatory. Failure to comply may result in disciplinary action, termination of contract, and/or referral to statutory authorities.

1. General Safeguarding Responsibilities

All staff members must:

- Prioritise children's welfare: Take all reasonable steps within the scope of their role to protect children from harm, including *physical, emotional, and sexual* abuse; *neglect, bullying* (including cyberbullying); *grooming, exploitation, radicalisation*, and online risks.
- Know and follow policy: Be familiar with and comply with BBEVA's Safeguarding Policy, related procedures, and all legal obligations under UK safeguarding laws. Seek clarification from the DSL if unsure about any policy requirement.
- Act without delay:
 - Report any safeguarding concern *immediately* to the Designated Safeguarding Lead (DSL) or, if unavailable, the Deputy DSL (DDSL).
 - If a child is at immediate risk of significant harm, contact emergency services first (*Police: 999 in the UK*) and inform the DSL afterwards.
- Keep clear and secure records: Keep detailed, factual, and objective records of incidents, complaints, disclosures, or concerns. Avoid subjective language and personal opinions, or assumptions. Share all written reports and relevant correspondence with the DSL/DDSL for secure storage in accordance with GDPR

and relevant data protection laws.

- **Maintain boundaries:** Adhere to professional boundaries in all interactions with children avoiding behaviours that could be misinterpreted as inappropriate or favouritism.
- **Challenge unsafe practices:** If witnessing unsafe behaviour, act to stop it and report it, following the whistleblowing procedure if necessary.
- **Be vigilant online:** Be alert to inappropriate online contact, harassment, or content, and report concerns promptly.

2. Staff–Child Contact Guidelines

- **Respect personal space:** Maintain professional and appropriate physical boundaries; never engage in any form of sexual behaviour, sexualised language, or suggestive conduct.
- **Avoid one-to-one closed situations:** Conduct meetings in visible, open areas or with doors left ajar.
- **Safe transport:** Minimise situations where a single adult transports a child alone; document any such instances if unavoidable.
- **Communication boundaries:** Use only approved communication channels for contact with children. Personal phone numbers, private messaging apps, or social media contact are prohibited unless authorised by the DSL for safeguarding reasons.
- **Photography and recording:** Obtain written parental/guardian consent before taking or sharing images or videos of students, following GDPR and safeguarding rules.

3. Online Safeguarding

This part applies specifically to online schooling, private tutoring, and all interactions conducted via the internet.

- **Professional Environment:** All online lessons or meetings must be conducted in a professional setting. Ensure that both the physical and virtual backgrounds are neutral, free from any inappropriate or distracting content. Attire must be professional and appropriate.

- **Approved Platforms:** All online communication with children must be carried out via BBEVA-approved official platforms. The use of unauthorised third-party software is strictly prohibited.
- **Session Recording:** Unless otherwise directed, online lessons and one-to-one tutoring sessions should be recorded to safeguard both children and staff. Recording, storage and access must comply strictly with data protection regulations.
- **Data Privacy:** It is strictly prohibited to share links, files, or screenshots containing children's personal information or images online, unless it is necessary for the performance of duties and in full compliance with GDPR and safeguarding regulations.
- **Identifying Online Risks:** Remain vigilant in recognising signs of cyberbullying, online grooming, exposure to inappropriate content, and other online risks. Support and guide children in safe internet use, including awareness of the filtering and monitoring systems in place at BBEVA.

4. Educational Consultancy

This part applies specifically to Education Consultants, who, due to the particular nature of their role, must pay special attention to the following:

- **Sensitivity of Information:** They will have access to a significant amount of sensitive personal data about children (including transcripts, personal statements, family background, and even psychological assessment reports). Such information must be treated with the highest level of confidentiality and handled in full compliance with BBEVA's policies.
- **Prioritising Student Interests:** When providing guidance on education or academic pathways, the best interests and well-being of the children must always be prioritised above all else, rather than solely meeting parental expectations or commercial objectives.
- **Objectivity and Fairness:** Maintain neutrality and objectivity at all times, ensuring that recommendations are not influenced by personal preferences or any potential relationships with specific institutions.
- **Managing Expectations:** When communicating with families, professionally manage their expectations and avoid creating undue psychological pressure on the children.

5. Responding to Concerns or Disclosures

When a child makes a disclosure or a safeguarding concern is identified:

1. Listen carefully without interruption, judgment, or promises of confidentiality.
2. Reassure the children that they have done the right thing in speaking up.
3. Record the conversation as soon as possible, using the child's own words where possible.
4. Report immediately to the DSL or the DDSL if the DSL is unavailable.
5. Do not investigate or confront the alleged perpetrator yourself.
6. **Preserve evidence** (messages, screenshots, clothing) and pass it to the DSL.

6. Training and Ongoing Requirements

- Mandatory training:
 - All staff must complete safeguarding induction training before starting their work.
 - Refresher training must be undertaken at least every three years.
- Equivalency: Those who have valid safeguarding training from another provider are exempt from retraining but must demonstrate a full understanding of BBEVA procedures to the DSL.
 - Regular updates: All staff will receive safeguarding updates (briefings, newsletters, online modules) at least annually.
- Specialist training: DSL and DDSL will undertake advanced training every two years, plus ongoing professional development.

7. Promoting a Culture of Safeguarding

All members of staff are expected to:

- Model respectful, inclusive, and safe behaviours at all times.
- Promote open communication where children feel safe to express concerns.

- Stay alert to changes in a child's behaviour, mood, or appearance that may indicate distress or risk.
- Understand and support safe online behaviours, including awareness of filtering and monitoring systems in place.
- Contribute to a safe and positive environment both inside and outside the classroom.
- **Engage parents/guardians** — encourage partnership in safeguarding matters.
- **Foster resilience** — encourage self-esteem, critical thinking, and awareness of unsafe situations.

8. Additional International Safeguarding Considerations

For BBEVA staff and affiliates working internationally:

- **Local laws apply in addition to UK standards** — when in doubt, follow the higher standard.
- **Cultural awareness** — respect traditions but never compromise safeguarding principles.
- **Travel safety** — ensure safe accommodation, secure transport, and clear emergency contact procedures for children during trips.
- **Overseas reporting** — know the local equivalent of child protection services and police contact numbers.



Appendix 4B: Safeguarding Guidance for Host Families

This section provides detailed safeguarding responsibilities and standards of conduct for all Homestay Providers and host family members who accommodate children and young people under BBEVA's care.

It must be read alongside:

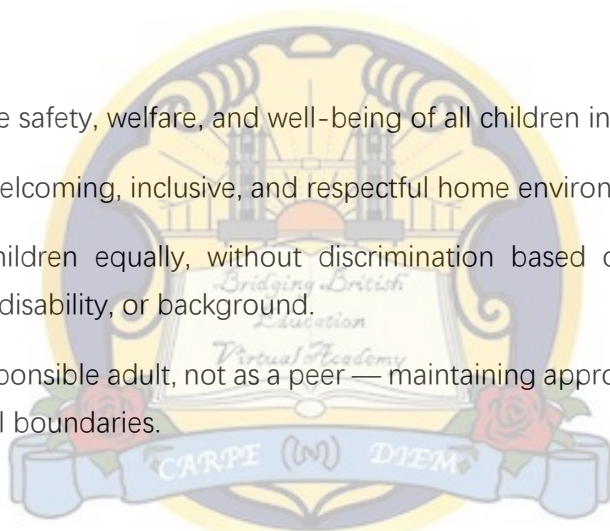
- BBEVA Safeguarding Policy
- Whistleblowing Policy
- UK national safeguarding legislation.

Compliance is mandatory. Breaches may result in immediate termination of the hosting arrangement and referral to statutory authorities.

1. General Principles

Host families must:

- Prioritise the safety, welfare, and well-being of all children in their care.
- Provide a welcoming, inclusive, and respectful home environment.
- Treat all children equally, without discrimination based on gender, religion, nationality, disability, or background.
- Act as a responsible adult, not as a peer — maintaining appropriate authority and professional boundaries.



2. Home Environment and Accommodation Safety

- Bedrooms:
 - Provide each child with their own bed and adequate personal storage space.
 - Do not allow children to share a bed with another person.
 - Keep bedrooms well-ventilated, clean, and safe from hazards.
 - Respect privacy — knock before entering, and enter only when necessary for duty of care, keeping the door ajar.
- Bathroom facilities:
 - Ensure children have safe and private access.

- Avoid being alone in the bathroom with a child unless in an emergency.
- General safety:
 - Maintain working smoke alarms, carbon monoxide detectors, and fire escape routes.
 - Keep dangerous items (medicines, cleaning products, sharp tools) securely stored out of reach.
- Wi-Fi and digital safety:
 - Use parental controls or filtering systems to block harmful online content.
 - Monitor online activity where appropriate, especially for younger children.

3. Health, Nutrition, and Daily Living

- Provide regular, balanced meals and access to drinking water.
- Respect dietary requirements (medical, religious, cultural).
- Ensure children have suitable clothing and bedding for the climate.
- Support good hygiene practices — encourage regular bathing, clean clothes, and handwashing.
- Know how to access local healthcare services and hold relevant emergency contact information.
- Inform the DSL immediately of any accident, illness, or medical treatment.

4. Supervision and Daily Interaction

- Ensure children are supervised appropriately for their age, maturity, and needs.
- Do not leave other guest children overnight without an approved adult guardian.
- Encourage participation in family activities while respecting the child's need for personal time.
- Avoid isolating the child from peers or normal social activities.
- Maintain open communication — check in regularly about their wellbeing.

5. Boundaries and Behaviour Expectations

- Physical contact:
 - Keep contact appropriate, non-intrusive, and respectful.
 - Never engage in sexual behaviour, sexualised language, or suggestive comments.
- Discipline:
 - No corporal punishment, degrading treatment, or shouting in anger.
 - Use calm, constructive discipline methods; consult the DSL if behaviour concerns persist.
- Substances:
 - Never provide tobacco, e-cigarettes, illegal drugs, or explicit materials.
 - Alcohol only if legal, with written parental consent, and in moderation in line with BBEVA policy.

6. Transport Safety

- Ensure vehicles used for transporting children are roadworthy, insured, and driven legally.
- Ideally, have two adults present when transporting children.
- If travelling alone with a child:
 - They must sit in the back seat.
 - Keep journey details logged and, if regular, share with DSL.
- Always use seatbelts and follow local traffic laws.

7. Cultural and Emotional Support

- Cultural awareness:
 - Learn about the child's background, customs, and religious practices.
 - Allow participation in cultural or religious observances.
- Language support:

- Speak clearly and avoid slang or idioms that may confuse.
- Encourage English (or host country language) learning in a supportive way.
- Emotional well-being:
 - Be alert to signs of homesickness, anxiety, or distress.
 - Offer reassurance but involve the DSL if concerns persist.

8. Communication and Privacy

- Use only BBEVA-approved channels for related communication with the child.
- Never connect with children on personal social media accounts.
- Keep personal matters of the family private — avoid oversharing with the child.
- Obtain written parental consent before taking or sharing photographs/videos.
- Store any approved photographs securely, never on personal cloud accounts.

9. Responding to Safeguarding Concerns

If a child discloses abuse or you suspect they are at risk:

1. Listen calmly, without interrupting or expressing disbelief.
2. Reassure them they were right to tell you.
3. Avoid making promises of confidentiality — explain that you must share concerns to keep them safe.
4. Record the disclosure as soon as possible, using the child's own words.
5. Contact the DSL immediately (or emergency services if there is immediate danger).
6. Do not investigate or confront the alleged perpetrator yourself.

10. Emergencies

- Keep an updated list of:
 - DSL/DDSL contacts
 - Local police, ambulance, and fire services numbers

- Nearest hospital and GP surgery
- Have a household emergency plan (fire, medical, lockdown).
- Notify BBEVA immediately of any incident affecting the child's safety or well-being.

11. Training and Review

- Complete initial safeguarding training before hosting begins.
- Attend refresher safeguarding sessions at least every three years.
- Read and acknowledge annual safeguarding updates from BBEVA.
- Cooperate with home visits, checks, and monitoring by BBEVA or regulatory bodies.



Appendix 5: Safeguarding Incident Report Form

(Please refer to the following page.)



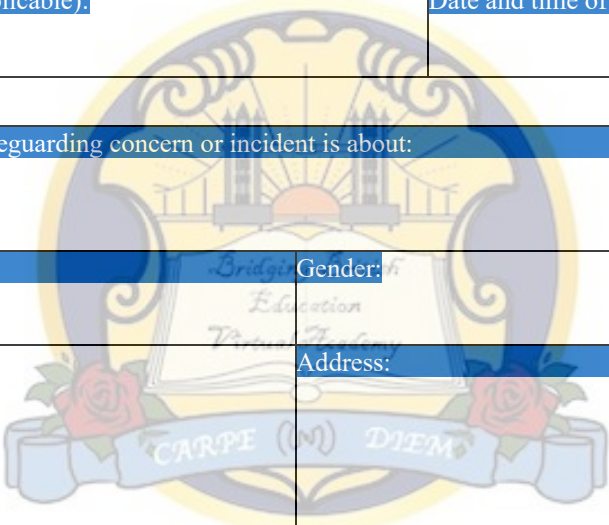
Safeguarding Incident Report Form

This form is to be used to record basic information in the light of an allegation, suspicion, or disclosure of a potential safeguarding concern.

Completing this record should not stand in the way of contacting the Police or other agencies in the event of an emergency or urgent safeguarding incident.

Name & role of person completing this form:	
Address:	
Contact number:	
Programme/Service name(if applicable):	Date and time of completing this form:

Name/names of person/s the safeguarding concern or incident is about:	
Contact number:	Gender:
Date of birth:	Address:
Any further information that may be useful to consider:	



Parents/carers details:

Name:	Address:
Contact number:	Email:
Have parents/carers been notified of the incident?: Yes/No	If Yes, please provide details:

Incident Details:

Date and time:	Group Name (if applicable):
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Location of incident:

Description of the incident or concern: (continue on separate sheet if necessary & include reference number):
(Include relevant information such as what happened and how it happened, description of any injuries sustained, behaviour witnessed and whether the information provided is being recorded as fact, opinion or hearsay)

Details of any previous concerns, incidents or relevant safeguarding records:



Child, young person or adult at risk account of the incident or concern: *(use their own words)*

Witness account of the incident or concern:
(include further accounts on separate sheets as necessary. Include the reference number on each accompanying account.)

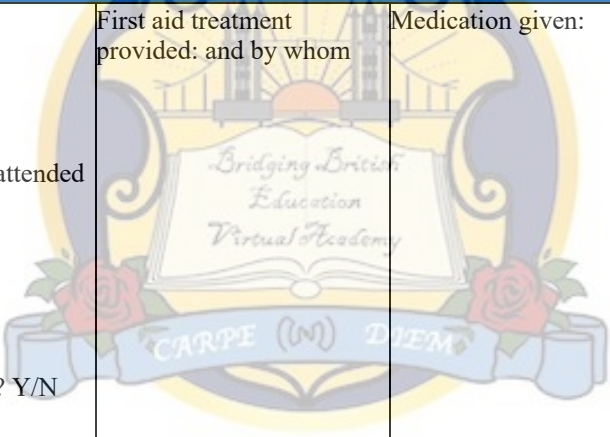
Details of any witnesses:

Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i>	Relationship to child, young person at risk:	Contact details:
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Details of any persons involved in the incident or alleged to have caused the incident, injury or presenting risk:

Name(s): <i>(Consider anonymising where this will not negatively impact the ability to take immediate response actions)</i>	Relationship to child, young person at risk:	Contact details:
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Outcome of incident & immediate actions taken: (tick box where relevant)

Ambulance required? Y/N Name of hospital / medical facility attended if applicable: Police/fire/rescue services attended? Y/N Notes:	First aid treatment provided: and by whom 	Medication given:
Any resulting change of plans or disruption to the programme, if applicable:	Disciplinary procedures enacted:	Were any immediate changes to risk management procedures made?
Signed By Author:	Name:	Date:

Reporting to the Designated Safeguarding Lead (DSL) section: (to be completed by DSL)

Date & time DSL notified of incident/concern:		
Date & time this form passed on to DSL (if different from above):		
DSL comments: <i>(actions taken / impact on rest of programme / external agency involvement / initial lessons learned / follow-up actions required):</i>		
		
External agency referral:		
Social services notified? Y/N	LADO notified? Y/N ⁿ	Other referral made? Y/N
Date & time of referral:	Date & time of referral:	Agency:
Name of contact person:	Name of contact person:	Date & time of referral:
Contact number/email:	Contact number / email:	Name of contact person:
Agreed action or advice given:	Agreed action or advice given:	Contact number / email:
		Agreed action or advice given:
Signed By DSL:	Name:	Date:

For Office Use Only:

Follow-up action required:		
Action:	Due date:	Whom responsible:

