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SAFEGUARDING & CHILD PROTECTION POLICY 2025/2026

Main Phone Number	0208 498 3300
Setting Address	BCA Clifton Avenue E17 6HL
Designated Safeguarding Lead	Charlotte Perchard Amina Sheta
Deputy Designated Safeguarding Leads	Faye Tilyard Hyacinth Slowley
Named Person for Allegations Against Staff & Volunteers	Sacha Corcoran / Charlotte Perchard
Behaviour lead	Lee Chalkley
SENDCo	Hyacinth Slowley
LAC Lead	Faye Tilyard
e-Safety Coordinator	Charlotte Perchard Amina Sheta
Principal	Sacha Corcoran
Chair of Governors	John Stone
Safeguarding Link Governor	John Stone
Out of Hours Safeguarding Contact	Charlotte.perchard@bigcreative.education Amina.sheta@bigcreative.education (please ensure you copy both DSLs into your email)

This policy is written in line with the Department for Education Publication *Keeping Children Safe in Education*, updated in September 2025 and will be reviewed according to publication updates. The policy is also reviewed annually when the Principal will report to the Governing Body on its operation and effectiveness.



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Key safeguarding contacts at the Big Creative Academy

Designated safeguarding leads and child protection leads:

Charlotte Perchard

Tel: 0208 498 3327

M: 07497 572782

E: charlotte.perchard@bigcreative.education

Amina Sheta

Tel: 0208 498 3328

M: 07904 580 935

E: amina.sheta@bigcreative.education

Deputy Designated Safeguarding Lead Deputy Director of Inclusion:

Name Hyacinth Slowley

Tel: 0208 498 3312

E: hyacinth.slowley@bigcreative.education

Deputy Designated safeguarding Lead and Designated Person for LAC:

Faye Tilyard

Tel: 0208 498 3300

E: faye.tilyard@bigcreative.education

Link Governor for Safeguarding:

John Stone

E: john.stone@bigcreative.education

Principal of the Academy:

Sacha Corcoran

Tel: 0208 498 3300

E: sacha.corocran@bigcreative.education



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Referral to Local Authority Social Services

If you feel that a child is at immediate risk of harm please call the Police on 999 who will be able to provide an immediate response. Alternatively, you can contact your local police on 101 at any time.

If you don't believe the risk requires immediate action, contact the Waltham Forest Multi Agency Safeguarding Hub team (previously the Referral and Advice Team) to discuss your concerns on:

Tel: 020 8496 2310 (Monday to Thursday, 9am-5.15pm and Friday, 9am-5pm)

Tel: 020 8496 3000 (Out of Hours).

You will get to speak to a social worker who is part of the Waltham Forest Multi Agency Safeguarding Hub (MASH) team. The social worker will need to gain as much information as possible about the child and the family.

If the young person does not reside in Waltham Forest contact their home borough social services.

Key contacts within the Local Authority

The Safeguarding in Education Service is able to provide advice and consultancy in non-emergency situations:

<https://www.walthamforest.gov.uk/Pages/Services/safeguarding-education.aspx?I1=100014&I2=200127>

The Waltham Forest Local Safeguarding Partners (Waltham Forest Safeguarding Children Board) can provide advice and training. The Local Safeguarding Partners within Waltham Forest consist of; Waltham Forest Council, NHS Waltham Forest, Newham and Tower Hamlets CCGs and Waltham Forest and Newham Police.

- Caroline Coyston – LADO & Safeguarding in Education Team Manager - 07770 052 421
- Susannah Bennett – LADO & Safeguarding In Education Assistant Team Manager - 07767 161 200
- Jennifer Knight - Early Years Safeguarding Lead – 07866 314 144

LADO@walthamforest.gov.uk
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1- Introduction

Big Creative Academy fully recognises its responsibility for the safeguarding and protection of learners and vulnerable adults, and its responsibility for promoting the welfare of young people and vulnerable adults who are learners at the Academy. At all times, the Academy aims to create and maintain a safe environment for all learners, staff, volunteers and visitors.

An effective whole organisation safeguarding policy is one which provides clear direction to staff and others about expected behaviour when dealing with safeguarding issues. An effective policy also makes explicit Big Creative Academy's commitment to the development of good practice and sound procedures. This ensures that safeguarding concerns, referrals and monitoring may be handled sensitively, professionally and in ways which support the needs of the learner

Parents, carers or other interested parties can obtain a copy of this Safeguarding and Child Protection Policy on the website.

Big Creative Academy takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care. "The welfare of the child is paramount" (Children Act 1989).

This policy applies to all governors, staff, agency staff, contractors, visitors and volunteers working for or within the Academy. There is an expectation that staff have understood rather than just read updated KCSIE 2025. School governors and proprietors to decide if staff not working directly with children are to read Part One or only need to be given condensed version.

Keeping Children Safe in Education 2025 is statutory guidance and applies to all schools and colleges. Schools are defined as "all schools whether maintained, non-maintained or independent schools (including academies, free schools and alternative provision academies), maintained nursery schools and pupil referral units." Colleges means "further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992 and institutions designated as being within the further education sector." College also means "providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended): 16-19 Academies, Special Post-16 institutions and Independent Training Providers."

A link to the full version of KCSIE 2025 can be found here [-Keeping children safe in education 2025 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101321/ksie-2025.pdf)

2- Safeguarding Principles

Big Creative Academy is committed to the following safeguarding principles:



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All young people and vulnerable adults have the right to be safe from harm, abuse, exploitation and radicalisation.

The welfare of the learner is paramount and this principle underpins all safeguarding work statements about abuse or neglect made by learners will be taken seriously

The health and wellbeing of learners, which underpins a successful learning experience

There are three main elements to our safeguarding policy;

- Prevention through the creation of a positive atmosphere and the teaching and pastoral support offered to learners.
- Protection by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns.
- Support to learners and staff who may be affected by safeguarding concerns or issues arising.

Big Creative Academy recognises it is an agent of referral and not of investigation.

All staff must maintain an attitude of **'it does happen here'** and everyone who comes into contact with learners has a responsibility to safeguard them.

Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

(Keeping Children Safe in Education 2025)



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3- Definitions

For the purposes of this policy:

- a 'child' is someone who has not yet reached their 18th birthday (Children Act, 1989)
- a 'vulnerable adult' is any person over the age of 18, "who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation because of mental or other disability, age or illness."
- 'staff' means all employees, full-time or fractional and all agency, franchise, contract and volunteer staff working at or for the Academy;
- the term 'learner' is used in this policy to refer to all students enrolled and anyone who is under the age of 18 or who meets the definition of a vulnerable adult.
- 'visitor' means any person who enters the building who is not a staff member
- 'volunteer' means any person who is in paid or unpaid employment in the Academy
- 'parent' includes the natural or adoptive parent as well as someone who has parental responsibility
- Safeguarding is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

4-Legislative Context and Framework

All action taken in line with the following guidance:

- Safeguarding Partnership guidelines
- Domestic Abuse Act 2021
- London Safeguarding Children Partnership Procedures
- Keeping Children Safe in Education (September 2025)
- What to do if You're Worried a Child is Being Abused - Advice for Practitioners (March 2015)
- Working Together to Safeguard Children (December 2023)
- PREVENT Duty, as per the Counter Terrorism and Security Act (2015), see Appendix A
- Section 175 of the Education Act 2002 places a duty upon this Academy to safeguard and promote the welfare of learners. Working Together to Safeguard Children and the



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London Child Protection Procedures provide a framework for enabling the Academy to fulfil its statutory duties effectively and efficiently in the best interests of learner and young people.

- Section 11 of the Children Act (2004) requires all agencies working with or coming into contact with anyone under the age of 18 to have measures in place to safeguard and promote their welfare.
- The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK.
 - It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.
- Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:
 - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
 - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
 - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,
 - and • Protocol 1, Article 2: protects the right to education.
- Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Equality Act 2010 – this Act sets out the following:

- The Academy must not unlawfully discriminate against and student because of their protected characteristics
- The Academy must consider how we are supporting students with protected characteristics
- The Academy must take positive, proportionate action to support with the disadvantages students face.
- The Academy takes into account the Public Sector Equality Duty (PSED) and is therefore conscious that students with protected characteristics may be more at risk of harm. This is accounted for throughout this policy.



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5-Purpose and aims of policy

The purpose of this policy is to:

- Raise the awareness of all staff of the need to safeguard learners and of their responsibilities in identifying concerns and reporting them immediately.
- Provide a framework to support staff in identifying concerns that a learner may be suffering or at risk of suffering harm or abuse thereby enabling them to report those concerns without delay
- Promote and maintain an environment where learners feel secure and are listened to
- Promote an environment where learners and staff treat each other with mutual respect and develop positive relationships, which are built on trust
- Ensure that staff and students are aware of the PREVENT agenda via training sessions for staff and information sessions for students (see Appendix A)
- Ensure that the Academy has sufficient staff for safeguarding and child protection to enable one of them to be available or contactable at all times during the Academy day
- Ensure that the Governing Body has a nominated member who is responsible for safeguarding and protecting learner and vulnerable adults
- Enable and support good levels of communication between staff to ensure that relevant information about learners is disseminated is shared with appropriate staff on a 'need to know' basis
- Ensure that the Designated Safeguarding Leads have undertaken suitable and appropriate training and that this training is updated every two years
- Ensure that all staff receive safeguarding and child protection training every two years and refreshed annually.
- Develop and promote effective working relationships with partner agencies, including Children's Social Care, the Police Child Abuse Investigation Team and the borough.
- Provide a systematic means of monitoring learners who are thought be at risk of harm or who are subject to child protection plans
- Provide structured procedures within the Academy, which will be followed by all staff when there are concerns about a learner who is potentially deemed at risk. These concerns should be recorded appropriately in a centralised source
- Ensure that all adults working with learners in the Academy community have undergone appropriate safer recruitment vetting and checks as to their suitability to work with learners in line with the Academy recruitment process
- Ensure that procedures are followed where an allegation is made against a member of staff or volunteer with the involvement of the Local Authority Designated Officer (see Appendix B for a flowchart of process for dealing with allegations against staff)
- To support young people's and vulnerable adults' development in ways that will foster security, confidence and independence and to promote this through the curriculum, the tutorial programme, enrichment activities and the student forum.



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6- GUIDANCE

This policy should be read in conjunction with the Department for Education Summary Booklet What to do if You're Worried a Child is Being Abused - Advice for Practitioners.

All Academy staff should be knowledgeable about what constitutes abuse (see Appendix C detailing indicators of abuse).

7- PROCEDURES

All action is taken in line with the following guidance;

- Safer Partnership guidelines
- London Safeguarding Children Partnership Procedures
- Keeping Children Safe in Education (September 2025)
- What to do if You're Worried a Child is Being Abused - Advice for Practitioners (2015)
- Working Together to Safeguard Children (2023)

Big Creative Academy staff who work unsupervised will be kept informed about safeguarding responsibilities and procedures through induction, briefings and awareness training. There may be other adults in the Academy who rarely work unsupervised, more usually working alongside members of staff. However the DSL will ensure they are aware of the Academy's policy.

Any member of staff, including supply staff, volunteer or visitor to the Academy who receives a disclosure or allegation of abuse, neglect, exploitation or suspects that a learner may have suffered significant harm or be at risk of suffering significant harm, or who notices signs or indicators of abuse must make an immediate telephone report to the DSL or in their absence, the Principal. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff available.

Options for the DSL will then include:

- Managing any support for the learner internally via the Academy's own pastoral support processes
- An early help assessment
- A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm

The young person concerned must be informed that this information is being passed on to the Academy DSL who will deal with information in line with this policy.



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If there is a referral to statutory services by telephone, the referral to local authority social services must be confirmed in writing by the end of the working day.

The DSL should follow up with local authority social services within 24 hours of the referral to determine the outcome of the referral and any action to be taken.

Big Creative Academy is committed to sharing referral information with learner's parents/carers in accordance with the document Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018). The Academy is mindful that information sharing will not take place if to do so will place the learner at greater risk of harm or impede a criminal investigation. On these occasions advice will be taken from local authority Children's Social Care or the police.

The reporting member of staff must, as soon as possible, but at the latest by the end of the working day, make a written record of the disclosure of their concerns and send it via email to the DSL who will record it in the learner's record.

Where concerns do not relate to the immediate risk of significant harm the designated safeguarding coordinator will discuss the concerns with relevant colleagues and agree a plan of action which will be recorded by the designated safeguarding coordinator in the learner's notes.

Where concerns about the safety or wellbeing of a young person exist it may be appropriate to approach relevant agencies (former schools, colleges etc.) to see if there is any relevant information available.

All staff, but especially the DSL should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

8- Roles and Responsibilities – who is responsible for safeguarding?

The Academy is committed to providing an environment where learners can learn, develop and achieve and where they are safeguarded and are enabled to tell or communicate if they are being harmed in some way. The Academy will seek advice from and work in partnership appropriately with Waltham Forest Children's Social Care and partner agencies in fulfilling its safeguarding and child protection responsibilities. The Academy is committed to ensuring that all staff are sensitive to the issues of characteristics protected by the Equality Act (2010) and that these issues should never be a barrier to sharing and reporting concerns about learners (please see the Academy's Equality and Diversity Policy).

No single professional can have a full picture of a child's needs and circumstances. This policy applies to **all staff**, including paid staff, volunteers and sessional workers, agency staff,



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organisations contracted to deliver services within the Academy], one-off visitors, students or anyone working on behalf of The Academy. This policy relates to all children (anyone up to their 18th birthday) with whom The Academy works with

All staff are given a copy of this policy as part of their staff induction (please see the Staff Induction Policy / Safer Recruitment policy).

For the purposes of this document, the term 'staff' will apply to those listed above because of their day to day contact with learners, staff in this Academy are well placed to observe possible signs of harm or abuse.

It is neither the role nor responsibility of those working with learners in the Academy to assess, diagnose or investigate whether a learner is at risk of or is suffering harm or abuse. It is the responsibility of all staff to be aware of the need to report any concerns about a learner to the Designated Safeguarding Lead or the Child Protection Lead as a matter of priority.

The voice of the child

All staff will ensure that their approach is child and family centred. This means that they will consider what is in the best interests of the child, and how to approach families with compassion and respect.

Staff will always seek to understand and give a voice to the lived experience of a given child and young person within the Academy, at home and within their wider community, even if children and young people are unable / unwilling to express their experience themselves.

8.1- The Role of the Designated Safeguarding Lead (DSL)

It is the role of the DSL to act as a source of support and guidance on all matters of child protection and safeguarding within the Academy.

It is expected that the DSL will have a complete safeguarding picture for Big Creative Academy and is therefore the person to whom all concerns should be reported.

In the absence of the DSL, staff should report any concerns to a Deputy DSL who will act in accordance with this policy and the Safer Partnership guidelines and report back to the DSL.

The Principal retains overall responsibility for and oversight of safeguarding within the Academy.



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The Designated Safeguarding Lead is responsible for:

- Ensuring that all staff receive appropriate safeguarding, child protection and PREVENT training to ensure that they are up to date with current legislation, policy and practice and that all staff new to the Academy receive the Safeguarding and Child Protection Policy in their induction pack to enable them to adhere to the Academy policy.
- The training of all staff, both teaching and non-teaching, to enable them to respond sensitively and appropriately to what learners tell them.
- Maintaining and updating safeguarding and child protection policies and procedures and ensuring that they disseminated and adhered to by all staff.
- Ensuring that there is a system for monitoring and recording concerns about learners at an early stage which is implemented across the Academy and adhered to by all staff.
- Managing child protection concerns and making referrals to Children's Social Care for the borough in which the child is resident when it is appropriate to do so and seeking advice and guidance on these matters when appropriate.
- Attending and providing reports to child protection conferences and core group meetings and contributing to child protection plans. Termly reports and should also be made available to the Academy Governing Body.
- Monitoring the attendance and progress of learners who are the subject of child protection plans and implementing the Academy's part of these plans.
- Informing the learner's Social Care team of any proposed educational changes for a child who is subject to a protection plan and alerting them if a child who is subject to a protection plan is absent from the Academy without reasonable justification.
- Ensuring that relevant information about learners is shared with staff on a 'need to know basis.
- Maintaining accurate safeguarding and child protection records which are held securely and confidentially.
- Ensuring that complete and accurate records are forwarded to receiving education providers, such as tutorial records and the individual learning plan and conversations and information sharing are started as soon as is reasonable.
- Ensuring that learners, parents and carers have access to the Academy safeguarding policies and procedures.
- Clarifying to lead tutors, the senior management team and student support services their role in monitoring students at risk in terms of welfare and tracking cases of concern.
- Ensuring that there is a member of staff for safeguarding available on site for staff or students to discuss concerns.
- Help promote educational outcomes by sharing the information about the welfare,



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safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.

- Ensure staff understand the procedures for dealing with child on child abuse, sexual violence and sexual harassment.
- Cascading awareness around Female Genital Mutilation (FGM)
- Takes part in strategic discussions and inter-agency meetings
- Liaises with the principal
- Liaises with the mental health support team

- Encourages a culture of listening to young people
- Understanding of relevant data protection legislation and importance of information sharing
- Liaises with the designated teacher for LAC students.
- Ensure safer recruitment / management of Allegations against staff & volunteers procedures are implemented

8.2- Responsibilities of the Principal

The Principal is responsible for ensuring that the Safeguarding and Child Protection Policy adopted by the Governing Body and procedures and all linked policies are fully implemented and followed by all staff.

It is the Principal's responsibility to allocate sufficient resources and time to enable the responsibilities of the Designated Safeguarding Lead to be discharged fully and to ensure that relevant staff are able to attend strategy discussions, child protection conferences and other inter-agency meetings and to contribute fully to the assessment of learners.

The Principal is responsible for ensuring that all staff feel able to raise concerns about poor or unsafe practice regarding learners, and that concerns will be addressed sensitively and in a timely manner in accordance with the Academy Whistle Blowing Policy. We recognise that it is not the responsibility of learners to raise concerns. It is the responsibility of all staff to share concerns about the actions or attitudes of colleagues with the Principal who will deal with the concerns appropriately.

The Principal will be responsible for dealing with all allegations against members of staff and liaise with the LADO and DSL.

The principal will lead by:

1. Ensures that the child protection policy and procedures are understood and implemented by all staff.



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2. Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
3. Ensures that the culture of the the Academy supports the provision of effective pastoral care and early help, and that staff do everything they can to support social workers when children's social care become involved.
4. Ensures that students are always provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe, including when online.

The principal with ensure adequate resources are given to safeguarding by:

1. Allocates enough time, training, support, and resources, including cover arrangements, when necessary, to enable the DSL and DDSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
2. Supports the designated teacher for looked after children to promote the educational achievement of any students who are:
 - looked after by the Local Authority
 - have an allocated social worker.
 - who have left care through adoption, special guardianship, child arrangement orders
 - were adopted from state care outside England and Wales

The principal with ensure Safer Recruitment and Allegations against Staff & Volunteers (ASV) by:

1. Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff (including agency staff and supply teacher) or volunteer to the Designated Officer for the Local Authority (LADO) within one working day prior to any internal investigation.
2. Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the LADO.
3. Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.



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4. Ensures that DBS checks for volunteers are undertaken which will be free of charge whilst undertaking in-house checks.

8.3- Responsibilities of The Governing Body

Governors and Trustees will receive appropriate safeguarding and child protection training at regular intervals. This training will provide the governing body with the knowledge required to ensure BCA safeguarding policies and procedures are effective.

The governing body ensures that Big Creative Academy:

Appoints a DSL who is a member of the senior leadership team and who has undertaken training in multi-agency working, in addition to child protection training

Ensures that the DSL role is explicit in the role holder's job description (and the job description of any DDSL) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.

Ensures that the DSL or a DDSL is always available during school or college hours for staff to discuss any safeguarding concerns. The DSL or a DDSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone and/or Skype or other such media.

Ensures that the DSL or a DDSL is always available at least via telephone or other media as above during any out of hours/out of term school activities.

Has a child protection policy and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly on the school's website or by other means.

Has procedures for dealing with allegations of abuse made against members of staff (including supply staff) and volunteers including allegations made against the principal and allegations against other children

Follows safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification from providing childcare regulations.

Develops an induction strategy that ensures all staff, including the principal, and volunteers receive information about the school's safeguarding arrangements, Staff Behaviour Policy (Code of Conduct) and the role of the DSL on induction.

Develops a training strategy that ensures all staff, including the principal, and volunteers receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard



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children effectively. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.

Ensures that all staff, including temporary staff and volunteers, have read and understood the school's child protection and safeguarding policy and Staff Behaviour Policy (code of conduct) before they start work at the school.

Appoints a designated teacher to promote the educational achievement of children who are looked after by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales; and ensures that the designated teacher has appropriate training.
Contributes to multi-agency working and plans.

Ensure there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Ensures an effective pastoral care offer and Early Help offer.

Ensures that children are taught about how to identify risks, including online, and how to access support and help.

Ensures procedures for child on child abuse, sexual violence and sexual harassment are in place and there is a zero tolerance approach.

Ensures that the voice and lived experiences of children are heard and reflected in the life of the Academy

The Governing Body is responsible for ensuring that any deficiencies or weaknesses in the Academy are remedied immediately. Whilst the Governing Body holds overall responsibility for the child protection and safeguarding functions of the Academy the day- to-day operational responsibility rests with the Principal and Designated Safeguarding Lead.

Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information as provided for in the Data Protection Act 2018 and General Data Protection Regulations (GDPR). This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal and should be treated as 'special category personal data'
- Understanding that safeguarding of children and individuals at risk is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so and that the sharing of information will enhance the



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safeguarding of a child in a timely manner but it is not possible to gain consent, if cannot be reasonably expected that against consent or if to gain consent would place a child at risk

- For schools, not providing personal data where the serious harm test under the legislation is met. An explanation of the harm test can be found on the Disclosure and Barring service website. Where in doubt independent legal advice should be sought.

8.4- Chair of Governors

The governing body nominates a member (normally the chair) is responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the principal.

8.5- Link Governor for Safeguarding

The governing body also identifies a named governor to take leadership responsibility for Big Creative Academy's safeguarding arrangements (Link Governor for Safeguarding). That governor will maintain regular contact with the DSL, meeting each half term, and will ensure that the governing body receives regular reports about safeguarding activity at Big Creative Academy.

It is the responsibility of the governing body to ensure that the school's safeguarding, recruitment and managing allegations procedures consider the procedures and practice of the Local Authority, local safeguarding partnership and national guidance. The governing body is also responsible for overseeing Safeguarding Audits completed and returned to the Local Authority under s175 of the Education Act 2002.

9- Safeguarding Training for Big Creative Academy Staff

"All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk."

(Keeping Children Safe in Education 2025)

Big Creative Academy ensures that:

- The DSL has undergone appropriate safeguarding and child protection training in accordance with Working Together to Safeguard Children 2023, the PREVENT duty and that further training is undergone every two years. The DSL will also attend appropriate training delivered by the Local Safeguarding Partnership to ensure that she/he is aware of current safeguarding issues and practice and that knowledge is refreshed annually.



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- All staff receive safeguarding, child protection and PREVENT training annually in addition to regular briefings and updates from the DSL.
- All new staff and governors are given a copy of the Safeguarding and Child Protection Policy as part of the Big Creative Academy induction process
- All new staff undertake safeguarding training to equip them to carry out their safeguarding responsibilities within the Academy.
- A central record of staff training is held.

Initial training for staff will ensure that:

- All staff are able to recognise possible signs and indicators of potential radicalisation in learners, particularly if the learners are vulnerable adults or have special educational needs or disabilities (see Appendix A).
- All staff are able to recognise possible signs and indicators of abuse in learners, particularly if the learners are vulnerable adults or have special educational needs or disabilities (see Appendix C).
- All staff know to whom they should report any concern about a learner's welfare and wellbeing and know that concerns will be taken seriously.
- All staff understand the Academy Safeguarding and Child Protection Policy and procedures and are clear about their statutory duties.
- All staff are aware of how to manage a disclosure from a learner in order to promote the best outcomes for that learner.
- All staff are aware of the boundaries of confidentiality and disclosure and understand when the disclosure of confidential information would be a proportional response to the need to safeguard a learner.
- All staff understand they have a duty to report any child protection and vulnerable adult issues to the DSL.
- All staff understand that they have a duty to safeguard and promote the welfare of learners through wellbeing and enrichment activities.
- All staff understand that nothing in respect of sexual harassment, violence or child on child abuse will be passed off as banter

10- Safe use of technology/ Online Safety

Children and young people commonly use electronic equipment including mobile phones, tablets, and computers daily to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat, Tik Tok and Instagram. Those technologies and the internet are a source of fun, entertainment, communication, and education. Unfortunately, however, some adults and young people will use those technologies to harm



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children and the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

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

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Big Creative Academy's Online Safety policy explains how we aim to keep students safe in college and protect and educate students on the safe use of technology. The Academy has implemented appropriate filters and monitoring systems in place to protect students from potentially harmful online material. The Academy completes an annual review of our online safety policy which is also supported by an annual risk assessment. This will consider and evaluate any emerging risks our students face when participating in online activity.

All students and staff at the Academy will be required to sign BCA's 'Acceptable Use Agreement' - a document that sets out expectations of safe use of the internet and devices whilst at Big Creative Academy. The Acceptable Use Agreement is a document/agreement highlighting that students must use technology and the internet in a safe and respectful manner. Failure to not comply with these instructions may result in disciplinary action. Cyberbullying and sexting by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Serious incidents may be managed in line with our sexual exploitation policy or child protection procedures.

Filtering & Monitoring Checks

Any person using the BCA WIFI will be required to sign-in using their own personal usernames and passwords. Staff and students must not share these login details. Social media apps have been blocked and will not be accessible using BCA WIFI.



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The DSL will regularly conduct checks on BCA's filtering and monitoring system to identify any concerns relating to internet usage. Both staff and students are subject to these searches. Checks will be conducted on; flagged terms and blocked searches. Students who have been flagged for concerning terms or blocked searches will be spoken to by a member of the safeguarding team to check-in on safety, identify any areas of need and to remind students to use the WIFI in a responsible and safe manner.

Alerts are active on BCA's filtering and monitoring system which will scan student accounts on Google Docs and Microsoft Office as well as general internet use for any concerning, inappropriate or harmful content. The filtering and monitoring system scans any text and content viewed and/or created by students and notifies the Designated Safeguarding Lead in real-time. Concerns regarding students' internet use at BCA will be documented securely.

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to children online in the same way that they notice and report offline concerns. Staff should be prepared to respond to online challenges and online hoaxes and can refer to this useful guidance for help and support <https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes>

10.1 Online communication between staff and pupils

Staff must be aware of the acceptable use policy, and this should give advice regarding personal online activity, use of social networking and electronic communication. Under no circumstances is it acceptable for staff to communicate via personal devices / social media with pupils. Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and/or may be subject to disciplinary action.

Out of Hours Contact

Communication between staff and students must only occur during college hours (Monday-Thursday 9am-5pm, Friday 9am-2pm). All communication must be sent using college email addresses via Big Creative Academy's email platform and Google Classroom, students must only communicate via Academy email. All communication via Microsoft 365 is subject to spot checks as per acceptable use policy.

Should a member of staff have a safeguarding concern relating to a student outside of college working hours, the DSLs should be contacted via their work mobile phone and/or email to share concerns once the concern has been identified/reported.

10.2- Online filters and monitoring



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All relevant staff have been given information about the provisions in place and know how to identify concerns and escalate matters to the senior leadership team.

The governing body, Designated Safeguarding Lead and IT Manager will ensure the Academy has appropriate filters and monitoring systems in place and regularly review their effectiveness. They will ensure that the leadership team and all staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The governing body will consider the age range of the Academy's students, the number of students, how often they access the IT system and the proportionality of costs versus safeguarding risks.

Big Creative Academy currently uses a web filtering application enabling us to restrict what websites a user can and cannot access over the internet.

Big Creative Academy loaned laptops to all users also contain the web filtering application, again restricting the type of website can and cannot access, this filtering application will also be implemented when the device is being used at home

10.3- Education Off-site (remote learning from home)

There may be occasions when a student will complete their study program from home. There can be various reasons why a student may be instructed to continue their education from home which can include, but not limited to: behavioural concerns, safeguarding risks, medical issues and exclusion.

In the event that this arrangement is advised, the Head of Curriculum for the student's subject area will liaise with the Academy's Designated Safeguarding Lead to confirm arrangements, ensure suitability and to consider possible risk-factors for students to learn from home. Big Creative Academy will make every effort to ensure that remote learning is carefully considered; there must be clear reasons why a student is instructed to continue their education at home.

Arrangements for Students Educated Off-Site:

Students who will be continuing their qualification from home will receive remote support from their Tutor to ensure that they fully understand what is expected of them from a curriculum aspect. Tutors will make regular contact with learners who are working remotely to ensure they are supported and can access guidance around work completion and deadlines etc. Tutors must also notify parents/carers for any learners under the age of 18 (or above with student's consent) of the expectations, outlining work that must be completed along with deadlines for submission. Contact will be made via college email addresses.



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Occasion might arise when a student who is educated off-site may need to attend the Academy. This may be required to allow students to sit their exams, access specialist resources and complete any practical assessments and/or observations. Students must sign-in at reception on occasions like this for health & safety reasons.

Tutor will maintain contact with student during their time learning from home, it is important that students are provided with any information or resources they may need to complete their study program at home.

11- External agencies, contractors, visitors and volunteers

11.1- Extended Services and Activities

The Governing Body of the Academy is responsible for controlling the use of the Academy premises both during and outside Academy hours, except where a trust deed allows a person other than the Governing Body to control the use of the premises, or a transfer of control agreement has been made.

Where services are provided directly under the supervision and management of the Academy, the Academy safeguarding policies and procedures will apply.

Where activities and services are provided separately, the Governing Body will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are agreed arrangements to liaise with the Academy on these matters where appropriate.

Evidence of appropriate policies and procedures must be provided to the Governing Body.

The Governing Body will only work with providers that can demonstrate that they have effective child protection policies and procedures in place, provide appropriate training and that the vetting arrangements for their staff are compatible with those of the borough educational managing body and government guidance.

The Governing Body will enter into a formal letting contract with the provider once these conditions are met but reserve the right to withdraw permission for any letting.

There will be at any one time, a number of professionals delivering services to learners on behalf of the Academy in the community as well as on the Academy site. These professionals may be employed by partner agencies or other agencies. All staff providing services to learners whether in the Academy or in the community on behalf of the Academy must adhere to the Academy's Safeguarding and Child Protection Policy and have understood its content.

Risk assessments for external visitors coming to the Academy will be carried out in advance of the visit to ensure a safe environment for all learners.



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Staff from partner agencies working with learners in the community will follow the referral procedures of their own agency and will inform the DSL that they have made a child or vulnerable adult protection referral as a matter of priority.

11.2- Managing Visitors on Site

Visitors to Big Creative Academy are carefully managed to ensure safeguarding for learners.

Upon arrival, visitors are briefed on the Academy's safeguarding responsibilities and given the document 'Keeping safe – information for visitors' please see Appendix C

Visitors are collected from reception by a member of staff and returned to reception. Visitors are never left alone with learners.

For visitors that will be engaging with learners for workshops, sessions and talks, checks are carried out prior to the visitor attending as follows:

- Where a visitor will be delivering content to students, the safeguarding team will be informed so as to perform internet checks and a social media review to eliminate any cause for concern around content and appropriateness.
- Any causes for concern will be reported to the DSL and appropriate action will be taken i.e. report to local authority or to the Waltham Forest PREVENT link or advise that this person will not be able to engage with our students

11.3- Contractors

Regular contractors who work on site will be DBS checked as part of the service level agreement between them and the Academy and will be expected to read and adhere to this Safeguarding Policy. Occasional contractors who have not undergone DBS checks will be supervised at all times while they are on site. APPENDIX E.

11.4- Agency Staff and Volunteers

Agency staff and those who work at the Academy for one or two days, including volunteers, will be asked to provide their DBS check before they can begin work. They will be given a summary copy of the Child Protection and Safeguarding Policy and will be asked to sign to confirm that they have read and will adhere to it.

All volunteers will need an enhanced DBS check (which should include children's barred list information) if left unsupervised with children. Big Creative Academy will ensure a full vetting sheet is required from the company they are employed with confirming that they have completed their due diligence around agency members of staff.



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They will all need to be sent a copy of the Safeguarding policy and write to confirm they have read and understood these policies and will adhere to them.

A risk assessment should be made for each volunteer and should consider:

- the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability, and
- whether the role is eligible for a DBS check, and if it is, the level of the check, for volunteer roles that are not in regulated activity.

Although BCA is not the direct employer of Agency Staff and therefore do not have jurisdiction in applying disciplinary procedures to Agency Staff, we still have a duty to ensure that any allegation is dealt with properly.

All Agency Staff are under the supervision, direction and control of BCA's governing body and Principal when working in the school or college.

BCA will not cease working with an Agency Staff due to an initial safeguarding concern, until the concern is fully investigated and consultation has taken place with Waltham Forest's local authority designated officer (LADO) to determine a suitable outcome.

The DSL, Governor in charge of Safeguarding and Principal either separately or in a joint effort will discuss with the Supply Agency whether it is appropriate to suspend the Agency Staff or deploy them to another area of the college whilst the investigation is carried out.

This section, as well as the entire Safeguarding and Child Protection Policy is available to both the Supply Agency and Agency Staff upon request.

11.5- Site Security

All learners and staff should be able to feel safe when they are in the Academy.

All staff and learners will wear their ID at all times and will not be allowed to enter a site without it. Visitors will be asked to show their ID where appropriate (for example Ofsted and other professionals who are visiting the site), and to sign in and wear a visitor's badge at all times. No visitor will be admitted on site unless they are accompanied by a member of Academy staff.

11.6- Use of College Premises for Non-college Activities



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Where the Academy hires or rents out college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe as detailed in our Premises Hire Contract.

When services or activities are provided by the Academy, under the direct supervision or management of our college staff, our arrangements for child protection will apply.

If the Academy receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purpose of running activities for children (community groups, sports associations or services-providers that run extra-curricular activities) our own safeguarding policy and procedures may apply, including informing the LADO of any concerns relating to members of staff.

All concerns, incidents or allegations that arise when using Big Creative Academy's Premises must be reported to the Academy's Designated Safeguarding Leads and/or Facilities/Health & Safety Manager as soon as possible by contacting their work mobiles and sending an email including all details of what has occurred. The DSLs will work with organisations to ensure that concerns are responded to appropriately. If an emergency occurs, 999 must be dialled immediately.

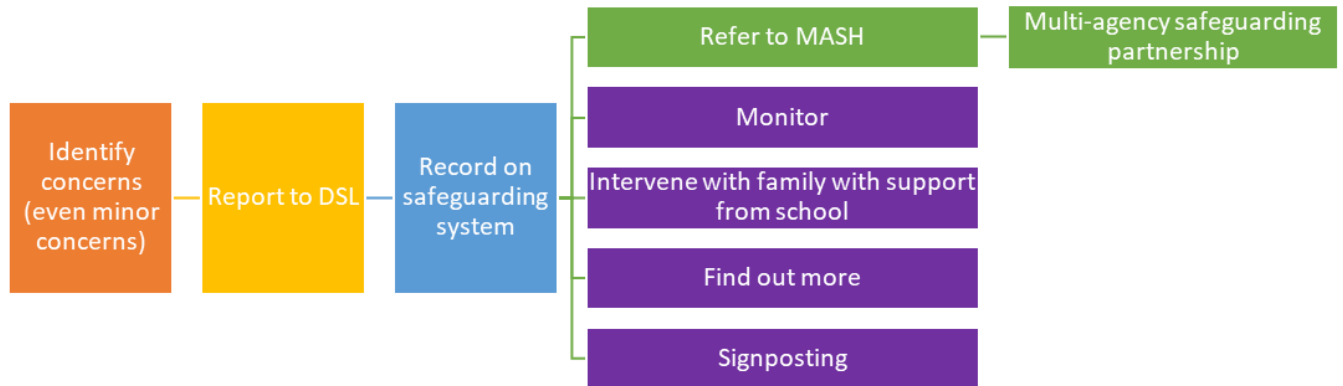
The academy will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

The Academy recognises it's duty to ensure that when the premises is hired to organisations or individuals that checks must be carried out in-line with the Government's Prevent Duty and [Waltham Forest's guidance on Premises Hire and Due Diligence Guidance](#).

Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

(KCSIE2025)

12- Process



12.1- Supporting Learners and teaching learners how to stay safe

The Academy will promote the wellbeing of all its learners in terms of:

- Physical and mental health and emotional wellbeing
- Protection from harm and neglect
- Education, training and recreation
- The contribution learners make to society
- Social and economic wellbeing

12.2- Categories of Abuse (Appendix B):

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

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

(Keeping Children Safe in Education 2025)

Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:



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- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance
- Missing from home/care/education

We recognise that a learner who is abused or neglected may find it difficult to develop and maintain a sense of self-worth. We recognise that a learner may feel helpless and humiliated and may blame themselves for what has or is happening to them. Our Academy may provide a vital source of stability in the life of learner who has been abused or is at risk of harm. We recognise that the behaviour of a learner in these circumstances may range from that which is perceived to be 'normal' to aggressive or withdrawn.

We aim to support the learners in our Academy by:

- Encouraging a sense of self-worth and assertiveness whilst not condoning bullying and aggression. Bullying in itself may result in the threshold of significant harm being met and we take seriously our responsibility to challenge bullying behaviours in accordance with our Anti-Bullying & Harassment Policy; all allegations of bullying must be recorded.
- Promoting a caring and safe environment within the Academy
- Providing a safe forum for debate of issues relating to equal opportunities and PREVENT.
- Providing opportunities through the curriculum for learners to learn strategies to protect themselves, ask for help and support and gain confidence in standing up for their rights and valuing and respecting others. e.g. through awareness raising activities and workshops including sexual health, anti-bullying, drug and alcohol support, LEAP anger management, gang prevention and health
- Working in partnership with other services involved in safeguarding learners and notifying Children's Social Care or the Vulnerable Adults Team as soon as there are significant concerns about a learner
- Safeguarding and online safety is promoted through a learners' course (wellbeing,



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enrichment and curriculum) and learners are encouraged to recognise their own responsibilities to safeguard themselves and others.

Guidance and support for learners is available through a range of student support services including wellbeing sessions, student counsellors and advisors, these aims are underpinned by the following Academy policies:

- Anti-Bullying and Harassment Policy, to include peer or peer abuse
- Complaints, Compliments and Concerns Procedure
- Health and Wellbeing Policy
- Health and Safety Policy
- Learning and Behaviour Policy
- No Smoking/Drugs Policy
- Online Safety Policy

To safeguard learners, all activities that take place outside of Academy premises must be prepared for and risk assessed in accordance with the policies and procedures. Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure (please refer to the Risk Assessment Policy).

12.3- Student Services and Safeguarding Induction through wellbeing sessions

Director for students introduces the service and team to all students during enrolment including what support is available and what to do if a student does not feel safe or is worried about their safety or their peer's safety. Students are encouraged to drop into the Student Services Hub for help and support in regards to their emotional well-being, academic progression, sexual health and financial help. Designated Safeguarding Lead is introduced to all students during assembly and is based in the Student Services Hub to allow easy access for emotional support or disclosures. Students will also be taught about online safety, child on child abuse, sexual violence and sexual harassment.

12.4- Prevent and anti-radicalisation training

London Borough of Waltham Forest PREVENT Officer attends induction assemblies and / or wellbeing sessions are facilitated to educate students and brief them around anti-radicalisation and resilience to extremist ideologies.

12.5- Dedicated Ward Officer- Children and Young Persons

The Academy works closely with a Metropolitan Police Dedicated Ward Officer for children and young persons (DWO-CYPS) who can provide information and guidance to staff and is available for students to speak with in regards to any concerns they may have. This partnership and



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presence of DWO-CYPS increases levels of safety for staff and students on site and provides a direct bridge to Metropolitan Police services.

The safeguarding team, may, on occasion report any alleged or known criminal activity via the DWO-CYPS that is allocated to work with Big Creative Academy. If the DWO-CYPS is unavailable to support, reports may be made online, by calling 101 or dialling 999 in an emergency.

Big Creative Academy Designated Safeguarding Lead may also liaise with Waltham Forest's Violence Reduction Coordinator to report any concerns within the local community and/or concerns relating to student's who live in Waltham Forest. These concerns can be shared with the VAWG team and any other relevant agencies to promote the safety and wellbeing of our learners.

12.6- Working in Partnership with Parents and Carers

The Governing Body and staff of the Academy are committed to creating and maintaining a culture of openness and honesty and strive at all times to work in partnership with parents and carers. We believe that this is in the best interests of students and their families. Only by developing co-operative working relationships within which parents and carers feel respected will we able to work holistically with students.

Parents and carers will be encouraged to access to our Safeguarding Policy, and a summary of it is included in the literature given to students and families on admission to the Academy. We believe it is important that parents and carers are aware of our statutory duty to safeguard and promote the welfare of students and that we will, where necessary, share concerns about students with Children's Social Care or appropriate agencies.

Wherever possible and appropriate we will aim to discuss concerns about students with their parents or carers and inform them if we intend to make a referral to Children's Social Care.

There may be instances however, when we judge that it is not appropriate to speak to a parent or carer before contacting Children's Social Care. This would happen when the DMS or a Deputy DMS in her absence, judges that a student's wellbeing will be imperilled if the parent or carer is aware that a referral to Children's Social Care is to be made. We will also bear in mind 'Fraser competence' and this will inform judgements and decisions.

"Successful outcomes for children depend on strong partnership working between parents/carers and the practitioners working with them. Practitioners should take a child-centred approach to meeting the needs of the whole family."- Working Together to Safeguard Children 2023

12.7- The role of schools in the early help process

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective



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responsibility to provide the right provision in their area. Some early help is provided through “universal services”⁴⁵, such as education and health services. They are universal services because they are available to all families, regardless of their needs. Other early help services are coordinated by a local authority and/or their partners to address specific concerns within a family and can be described as targeted early help. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family’s consent to receive support and services offered. These may be provided before and/or after statutory intervention.

(Working Together to Safeguard Children 2023)

Sometimes children and families require some support and intervention in addition to the above and schools can sometimes provide this from within their resources. This additional support could be put in place to improve a child’s attendance or behaviour or increase engagement with families with the aim of making school life a more positive experience.

It requires multi-agency working so that children and families receive the right support at the right time, in order to prevent difficulties from escalating or needs from increasing. In a school setting, this might include nurture groups, breakfast or after school activities, social skills groups or family learning opportunities. Since schools already have regular contact and good relationships with children and families they can often be the most suitable place for some early help to take place.

All Academy staff should be particularly alert to the potential need for early help for a learner who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves



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- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

The early help process: the process for accessing early help will vary in different Local Authorities (LA). Each LA is required to have strategy for early help and procedures for referral and assessment. Many LAs have an early help hub on their website.

The DSL will take the lead on early help cases and is aware of:

- The LA strategy for early help
- The process for making early help referrals
- The early help assessment process
- How the LA expects schools to be part of the early help strategy

The DSL should attend any training on early help offered by the LA or the Local Children's Safeguarding Partnership as part of early help support and intervention, the DSL may be in the position of being asked to take on the role of lead professional/practitioner.

This role includes:

- Being the single point of contact for a family
- Co-ordinating the delivery of agreed action
- Reducing overlap of services and inconsistencies
- More guidance on the role of lead professional should be available in the LA strategy and the LA or the Local Children's Safer Partnership may offer additional training about this.
- The DSL should ensure that all staff are aware of early help in their LA and this could be done via a staff briefing or bulletin after the DSL has attended training.

12.8- Professional Confidentiality

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, particularly in the context of safeguarding.

The only purpose of confidentiality in this respect is to benefit the learner. A member of staff must never guarantee confidentiality to a learner nor should they agree with a learner to keep a secret, as where there is a safeguarding concern this must be reported to the designated safeguarding coordinator and may require further investigation by appropriate authorities.

Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a "need to know basis" or around any student at risk of sexual violence, harassment or child on child abuse. Any information shared with a member of staff in this way must be held confidentially by them.



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Where sharing will be in the best interests of the relevant learner information will be shared with other organisations.

12.9- Records and Monitoring

Well-kept records are essential to good safeguarding practice. Big Creative Academy is clear about the following:

- The need to accurately record any concern held about a learner within the company
- The status of such records
- When these records should be passed over to other agencies.
- Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse must report concerns immediately to the designated safeguarding coordinator. All records will be dated and will include the action taken. These notes are kept in a confidential electronic learner record.

If a learner transfers from Big Creative Academy, these files may be copied and forwarded to the learner's new establishment marked confidential and for the attention of the designated safeguarding coordinator if this is deemed to be in the learner's best interests.

Concerns about learners should be recorded on the Academy's individual learning plan and on the central at risk register, which will detail the concerns about a learner, discussion with the DSL and parents or carers where appropriate and any agreed actions and outcomes. The reasons for decisions will also be recorded.

Tracking sheets, referrals to Children's Social Care and Child Protection Conference and Core Group meeting minutes will be held confidentially, separately from a learner's main Academy records. Records should be signed and dated and kept in chronological order. Academy actions minuted in child protection conferences/strategy meetings must be implemented.

Recording is a tool of professional accountability and is central to safeguarding and protecting learners.

The Academy should keep a central record of staff child protection training. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason it is vital that concerns are recorded accurately so that they can be monitored and emerging patterns noticed.

12.9.1- Referral

If a learner discloses that they have been subjected to abuse, neglect, exploitation, radicalisation or any other safeguarding risk, the staff member must report this to the DSL. The DSL will then respond and make the necessary referrals to Children's Social Care in the child's home borough. See Appendix A – PREVENT statement.

[Multi-agency Safeguarding Hub \(MASH\)](#) is Waltham Forest's single point of referral to social care for concerns regarding children, young people and vulnerable adults:



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- Early Help (parental consent needed)
- Child in Need
- Child Protection
- Adult Safeguarding

Referrals to the MASH should be made immediately when there is a concern that the child is suffering significant harm or is likely to do so. It is good practice to notify MASH by phone and/or email to discuss the situation prior to sending a written referral. This will help determine the level of intervention and will also give children's social care and the police time to decide to come and see the child that same day in school, if deemed necessary.

In the Academy the DSL ordinarily takes responsibility for the referral process, in consultation with staff who know the child. Still, there are circumstances where another member of staff must refer without delay:

- If for some reason (e.g., during the summer break), the DSL is not available, the referral should be made without delay by any other member of school staff
- If you disagree with your DSL's decision not to refer a case to MASH, it is your responsibility to refer the case, and to respectfully inform the DSL that you are doing so.

Should another member of staff refer instead, the DSL must be consulted and updated as soon as possible.

The Academy will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will make usually contact with the parent in the event of a concern, suspicion, or disclosure. Our focus is the safety and wellbeing of the pupil.

Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

12.9.2- DSL Decision-Making

Once concerns are identified and shared with DSLs, DSLs and involved staff will decide together how best to proceed to support the child and to mitigate the risk. DSLs can consult with MASH at any point.

Options for action are:



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Pastoral Care

[Keeping Children Safe in Education](#) 2025 acknowledges the casework that schools undertake on a pastoral level. This includes managing any support for the child internally via the school’s own pastoral support processes. If pastoral staff are engaged, they must work alongside safeguarding staff, and DSLs would take the lead on decisions about progressing a case.

Early Help (MASH)

Schools can refer children and families for early help assessment and support, with the informed consent of parents.

Referral to statutory services (MASH)

A referral must be made to MASH/children’s social care (and if appropriate the police) immediately if the child is:

- A child in need; defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled
- Suffering, or likely suffering, harm.

Allegation of harm to a child by a practitioner

If the alleged harm to a child is caused by a practitioner or a volunteer, the headteacher should be notified immediately and LADO should be consulted.

Following a number of cases nationally where senior leaders in schools failed to act upon concerns raised by staff, [Keeping Children Safe in Education](#) 2025 emphasises that any member of staff must contact and/or make a referral to Children’s Social Care if they are concerned about a child, if their DSL does not share their views.

12.9.3- Use of Reasonable Force



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Academy staff (including support staff, non-teaching staff and voluntary staff) are able to use such force as is reasonable and proportionate to the risk that presents in the circumstances to prevent a learner from:

- Committing an offence;
- Causing personal injury to any person (including themselves) or damage to any property;
- Prejudicing the maintenance of good order and discipline at the Academy
- This includes occasions when the learner is not on Academy premises e.g. on Academy visits.
- 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Big Creative Academy recognises that reasonable force should be considered especially carefully when dealing with learners with SEN, disabilities or medical conditions. These groups are particularly vulnerable and the staff should refer to individual learning plans as necessary.

The Principal and authorised staff have the right to search pupils for weapons without their consent, where they have reasonable cause to suspect they are carrying a weapon (see Search and Confiscation Policy). If resistance is expected the police must be called. Further guidance is at www.teachernet.gov.uk. The security staff at the Academy is trained in the use of reasonable force and restraint. Guidance is given to staff on appropriate behaviour including the use of physical restraint.

There should be a rigorous recording system and procedures in the Academy and reporting to the Local Authority. Parents/carers should be informed when restraint has been used and protocols agreed with parents/carers if use of restraint is thought likely. It is good practice for the member of staff with responsibility for child protection to check the record and to give the member of staff involved in the incident a copy. Learners displaying extreme behaviour in relation to a learning disability, autistic spectrum disorders, behavioural, emotional and social difficulties or pupils with severe behavioural difficulties should be handled according to the guidance in www.teachernet.gov.uk/wholeschool/sen/piguide.

Section 548 Education Act 1996 states that the use of force as a punishment is unlawful. Academies have two duties under Part 4 of the Disability Discrimination Act 1995 (as amended by the Special Educational Needs and Disability Act 2001):

- Not to treat a disabled child unfavourably without justification
- To take reasonable steps to avoid putting disabled pupils at a substantial disadvantage



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13- External Activities

13.1- Learners on Work Placements

Where under 18s who are on work placement are working on their own with the placement provider the Academy (or appropriate sub-contractor) will conduct an enhanced DBS check and an ISA check (if appropriate) on that individual student

The Academy will provide guidance to placement providers as to appropriate action they should take if a learner discloses to them.

The Academy will provide guidance to learners who are on work placement as to action they should take if they have any concerns about their placement.
(please refer to the Work Experience Policy).

13.2- Risk Assessment of Trips and Visits

All extended and off- site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection, Health & safety, and whistleblowing arrangements are in place.

Where extended college activities are provided by and managed by the Academy and it's child protection policy and procedures apply. If another body provide services or activities on the college site, Big Creative Academy will seek assurance that the provider's child protection policy and procedures are robust and sufficient. Good practice indicates education providers should seek written copies of external providers child protection policies and procedures. In addition, ensuring there are appropriate arrangements in place to liaise should there be any child protection concerns raised. Further details on these requirements can be read in our Premises Hire Contract.

14- Relationships

14.1- Professional Relationships with Learners

Big Creative Academy recognises that positive professional relationships with learners will support and promote the best outcomes for them. The Academy gives guidance on the expectations of staff in this matter to which all staff are expected to adhere. Good professional boundaries safeguard learners and safeguard professionals from unfounded allegations.

14.2- Personal Relationships

It is the prime duty of the Academy to provide a safe and secure learning environment for students and staff and to protect the safety and welfare of young people in its care. The guidance below ensures that staff maintain professional standards while at work and do not commit acts of impropriety or abuse the trust of students for whom they are responsible. The personal



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relationships referred to are those that are of a romantic and/or sexual nature. This includes the use of social media and digital means as set out in the Guidance for Staff on Appropriate Conduct and Behaviour.

A professional relationship exists where a member of staff is responsible for assessing, supervising, tutoring, teaching or providing pastoral support, administrative or technical support. Maintaining this professional relationship is vital to the educational development and achievement of its students.

Where staff engage in inappropriate personal relationships with students, this can have damaging effects, causing distress and lead to physical and mental ill health. Students may feel they have no choice but to comply with the employee's wishes or leave the course. At the same time, staff may make themselves vulnerable to claims of sexual harassment or abuse.

The Academy strongly disapproves of personal/sexual relationships between staff and students who are 19 or under or any student considered to be vulnerable, regardless of whether a professional relationship exists. Entering into such a relationship will be considered to be gross misconduct and will be investigated under the Academy Disciplinary Policy and Procedure.

The Academy strongly disapproves of personal relationships between staff and students above the age of 19 where a professional relationship exists. Such relationships must be reported to the relevant line manager, so that appropriate steps can be taken to ensure that s/he is no longer in a professional role in connection with that particular student. Failure to report the said relationship may lead to disciplinary action, depending on the individual circumstances of the case. Where no professional relationship exists between staff and student, a personal relationship should be reported to the line manager in order to protect everyone's interests.

All staff are reminded of the risks of a complaint being made against them and that they may face allegations of criminal misconduct. In some circumstances, staff may be referred to the Secretary of State and barred from teaching.

Staff may seek advice and guidance from the senior management team. Students may seek guidance from the Student Services manager or from one of the student advisers.

14.3- Safe Touch Policy and Code of Practice

The Academy recognises that in certain Performing Arts disciplines, e.g. Dance, it is necessary for the tutor to physically touch a learner to improve their understanding of the exercise or movement.

14.4- Photography and Videos

To protect students, we will:

- Seek their consent for photographs or video images to be taken, including consent for the reasons for which photos will be used and how long they will be kept as per Data



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Protection legislation.

- Seek parental consent for the those under 18 years old
- Ensure students are appropriately dressed
- Encourage students to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or publications), we will:

- Avoid naming children when possible and only if consent is obtained
- If it is necessary to name children, use first names rather than surnames
- If children are named, avoid using their image
- Establish whether the image will be retained for further use, where and for how long
- Ensure that images are stored securely and used only by those authorised to do so.

For the protection of students and staff, only college owned equipment will be used to record, and store images taken by staff or volunteers on the school site or during offsite school activities including residential visits.

There may be occasions when parents are requested not to take photographs where a child is subject to social care procedures or who requires protection of their identity and whereabouts. They will not be singled out; in this instance, a blanket ban will be imposed.

Visiting practitioners who work directly with children are subject to the same restrictions as school staff and volunteers in respect of recording and storing images of children. However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes only and in order to support the school, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

14.5- Online communication between staff and students

Staff must be aware of the acceptable use policy and this should give advice regarding personal online activity, use of social networking and electronic communication. Under no circumstances is it acceptable for staff to communicate via personal devices / social media with students. Staff found to be in breach of these rules will be the subject of a referral to the Designated Officer in the Local Authority and/or may be subject to disciplinary action.

14.6- Out of Hours Contact

Communication between staff and students must only occur during college hours (Monday-Thursday 9am-5pm, Friday 9am-2pm). All communication must be sent using college email addresses via Big Creative Academy's email platform, Microsoft Office and Google Classroom, students must only communicate via Academy email. All communication via Microsoft 365 is subject to spot checks as per acceptable use policy.



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Should a member of staff have a safeguarding concern relating to a student outside of college working hours, the DSLs should be contacted via their work mobile phone and/or email to share concerns once the concern has been identified/reported.

15- Staffing

15.1- Supporting Staff

We recognise that child protection is a difficult and sometimes upsetting subject for those who work with learners. Working with a learner who has suffered harm or is at risk of harm may be stressful and distressing. We are committed to supporting such staff by providing opportunities for them to talk through their experiences and anxieties with the DSL and to seek further support as appropriate. All staff and volunteers should feel able to raise concerns about poor or unsafe practice, such concerns will be addressed sensitively and effectively in accordance with the Whistle Blowing Policy.

We believe that working within an Academy that has clear safeguarding and child protection policies and procedures also helps to support staff in carrying out their duties and responsibilities effectively.

15.2- Allegations Against Staff

It is essential that the high standards of concern and professional responsibility adopted with regard to alleged child abuse by parents or carers are similarly displayed when members of staff are accused of abuse (see Appendix B).

This guidance will be followed where it is alleged that anyone working in the college, including supply teachers and volunteers has: behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Only authorised agencies may investigate child abuse allegations (local authority Children's Social Care, the police or in some areas, the NSPCC). Whilst it is permissible to ask the learner(s) simple, non-leading questions to ascertain the facts of the allegation, formal interviews and the taking of statements is not appropriate and may prejudice investigations.

All allegations should be recorded by the person receiving the disclosure. That person should also contact the managing director immediately after any allegation is made.

Where a staff member, volunteer or supply staff is accused of abuse, the Principal should in the first instance contact the Safeguarding in Education Service. If the allegation is not of abuse then the Academy's normal Disciplinary Policy and Procedure will apply.



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Through discussion and consultation with the Safeguarding in Education Service, a decision will be made whether to make a referral to local authority Children's Social Care and/or the police. Where the allegation is against a member of the senior management team the Principal will take this action. Where the allegation is against the Principal, the Chair of Governors will take this action.

The member of staff against whom the allegation is made will be kept informed about the allegation and the progress of the complaint, unless to do so may cause the risk harm to the complainant.

If after discussion with the Safeguarding in Education Service it is decided that a referral to local authority social services or police is not appropriate, it may still be necessary to address matters in accordance with the Academy's Disciplinary Policy and Procedure.

The Academy acknowledges that there are two levels of allegation/concern (Appendix E):

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – otherwise referred to as 'low-level concerns'.

15.3- Allegations that may meet the harms threshold:

Guidance will be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.)

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt, the Academy will seek advice from the Waltham Forest Local Authority Designated Officer (LADO).

Allegation Outcomes

The definitions that should be used when schools and colleges determine the outcome of an allegation are set out below:

- **Substantiated:** there is sufficient evidence to prove the allegation;



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- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

15.4- Low level concerns

As part of their whole school approach to safeguarding, schools and colleges BCA is committed to promoting an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

What is a low level concern?:

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet a harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

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

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the Principal, and recorded and dealt with appropriately.



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Low Level concerns reported about a supply member of staff and contractors must be notified to the employer of that staff member.

The Academy will consult with the LDA if we are unsure if the harm threshold has been met or not.

Reporting and recording low-level concerns:

All low level concerns remain confidential. In the first instance they will be reported to the Principal or DSL verbally and then in writing. The principal, where appropriate, will consult with the DSL in order to make a final decision on response and next steps.

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

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, BCA will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Responding to low-level concerns:

The principal will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for their decisions and action taken.



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16- Vulnerable students

16.1- Learners with Special Educational Needs and/or Disabilities

PSED and Research suggests that learners with disabilities and/or learning difficulties are more vulnerable to abuse. The risks may be increased by their need for practical assistance and physical dependency including intimate care, which may be delivered by a number of different carers, by possible communication difficulties and lack of access to strategies to keep themselves safe, or by the increased risk that they may be socially isolated. Please also refer to the Special Educational Needs (SEN) Policy.

Staff who work with learners in any capacity must be particularly aware of and sensitive to how the effects of abuse or harm may present and be able to pick up on any changes in behaviour or presentation that might indicate a concern (see Appendix C on indicators of abuse). Staff should not assume that possible indicators of abuse such as behaviour, mood and injury relate to disability without further explanation. Concerns should be shared immediately with the DSL.

Staff in the Academy will have important information about an individual learner's presentation, their levels of understanding and how best to communicate with them. All staff working with learners with special educational needs or disabilities will receive appropriate training to enable them to meet the needs of the learner appropriately and to recognise and report any concerns.

The Academy recognizes that learners with special educational needs may be more susceptible to abuse and staff members are aware that behaviour, mood and injury may relate to possible abuse and not just their SEN or disability.

All staff will take into account that changes in behaviour and/ or demeanour may not necessarily be linked to their disability but to consider the potential for abuse as a reason for these changes.

The Academy understands that there is a higher risk of peer group isolation, bullying and difficulties with communication for learners who have educational needs.

The DSL, Inclusion Manager and Student Services department liaise and work together to minimize the potential of abuse and recognize any signs of abuse or change in behaviour.

Learners with special educational needs have a higher risk of being isolated by their peers and may be disproportionately affected by bullying.

To provide the pastoral support for these learners, they will be encouraged to partner up with a staff mentor in which they can trust to ensure that regular communication is in place and to provide the learner with a designated adult that they can trust.

To ensure that all our pupils receive equal protection we will give special consideration to children who are particularly vulnerable.

Children & Young People Especially Vulnerable:



- Mental health concerns
- Young carers
- Learners with an EHCP or any learning difficulty
- Learners with a medical condition
- Learners with a physical disability
- Looked-after Children and Care-leavers
- Young people supported by Children's Social Care
- Transgender children / young people
- Affected by parental substance misuse, domestic violence or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism/susceptible to being radicalised

This list provides examples of additional vulnerable groups and is not exhaustive. We have an important role to play in supporting the mental health and wellbeing of our pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.



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All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

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

Immediate action should be taken in response to any mental health concerns about a child. Action will also be taken where there is a safeguarding concern already present, through reporting the concern to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care to establish whether a referral is required, or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

Advice to help identify children in need of extra mental health support, this includes working with external agencies can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice.

Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

16.2- Intimate Care

The Academy is committed to supporting and meeting the needs of learners with disabilities and will ensure that no learner is put at a substantial disadvantage compared with her or his non-disabled peers (please see the Academy's Disability and Accessibility Policy).

If a learner has particular needs which require intimate care or the administration of medication, a meeting will be held with the learner, their parents, carers and relevant health professionals to ensure that an individual support plan is drawn up to meet those needs appropriately. The learner's wishes and feelings will be taken into account and respected throughout this process. Please see the Academy's policy on Supporting Learners with Medical Conditions.



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17- Contextual safeguarding

All staff should be aware that safeguarding incidents and/or be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

“All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.”

“All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.”

(keeping children safe in education 2025)

18- Safeguarding concerns

18.1- Honour based abuse: Forced Marriage/Honour Violence/Killings

A ‘forced’ marriage is distinct from a consensual ‘arranged’ marriage because it is without the valid consent of both parties and where duress is a factor. A learner who is forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. Information about a forced marriage may come from the learner themselves, or the learner’s peer group, a relative or member of the learner’s local community or from another professional.

18.2- Honour based abuse: Female Genital Mutilation (FGM) and So-called honour-based abuse

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

FGM refers to procedures of any alteration involving partial or total removal of the external female genital organs. The procedure may lead to short term and long-lasting harmful consequences such as death, trauma, infections, flashbacks, infertility, kidney problems, sexual dysfunctions, incontinence, post-traumatic stress disorder etc.



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It is known to be practised in the North African countries, the Middle-East, Indonesia, Malaysia, India and Pakistan. However, with migration worldwide it is also practised in the UK, the USA, Canada, Australia etc.

One of the prominent reasons for the practice is to suppress women's sexual desire. There is a social pressure on women to undergo the procedure otherwise they may be segregated by their peers, or labelled "unclean". Furthermore, FGM is often a requirement for getting married in practicing communities. FGM is not a religious practice.

There is a range of potential indicators that a girl may be at risk of FGM.

FGM often takes place in the summer holidays, as the recovery period after FGM can be 6 to 9 weeks. Professionals should be mindful of at risk times when children go on long holidays and/or are getting a visit by female elder from their country of origin. Additionally, girls are considered at risk where their mother or sisters have undergone FGM, and girls are talking about a 'special' event or procedure to 'become a woman.'

The post FGM symptoms include, but are not limited to, difficulty in walking, sitting or standing, spending longer than normal in the bathroom or toilet, unusual behaviour after a lengthy absence, reluctance to undergo normal medical examinations, and asking for help but not be explicit about the problem due to embarrassment or fear. They can sometimes ask about their friend's problem rather than their problem. Professionals should raise an alert to Children's Social Care via the MASH if they have any FGM concerns.

Further information on warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi- Agency Practice Guidelines , and Chapter 9 of those Guidelines (pp42-44), which focuses on the role of schools and colleges.

The United Nations addresses FGM as violation of human rights. In the UK FGM is a criminal offence and a harmful form of child abuse. It is illegal to practice in the UK and/or anyone involved in taking girl outside of the UK to have FGM carried out will be punished under the FGM act 2003 and Serious Crime Act 2015. LBWF follows a comprehensive approach comprising prevention, punishment, enforcement, support and protection measures to safeguard young girls from FGM.

If staff have a concern they should activate local safeguarding procedures via the MASH, using existing national and local protocols for multi-agency liaison with police and Children's Social Care. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a legal duty upon that individual to report it to the police.

Mandatory Reporting Duty: Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.



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Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers¹, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils – it is likely that discovery will be made by disclosure by the student, parent or otherwise. These cases must be referred to police (via the local CAIT team or by calling 101). Immediate reporting is required if FGM has been performed recently, and in historical cases, reporting must take place within one month.

Mandatory reporting duty commenced in October 2015. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate.

Colleges can also:

- Circulate and display materials about FGM
- Display relevant information (for example, details of the NSPCC's Helpline and appropriate black and minority ethnic women's groups)
- Ensure that a private telephone is made available should students need to seek advice discreetly
- Inform colleagues/raise awareness of the issues around FGM – as well as including appropriate training in continuing professional development
- Introduce FGM into the school curriculum in relevant classes, such as personal, social and health education (PSHE), citizenship, religious knowledge, drama and history

Reference and further information:

- [Keeping children safe in education](#), DfE (see pages 16, 161)
- Multi-agency practice guidelines: FGM, Home Office, DfE (see pages 8, 16, 17 and 42)
- <http://www.londonscb.gov.uk/fgm/>

FGM and forced marriage are examples of honour-based abuse. In forced marriage, one or both spouses do not consent to the marriage, but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced. Honour-based abuse can be a trigger for forced marriage.

18.3- Housing: Learners under 18 living alone or without any parental or guardian support

The most common reason for children becoming looked after is as a result of abuse and/or neglect. A previously looked after child potentially remains vulnerable and all staff should have



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the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Academy staff must report any learners who are living alone or without parental or guardian support immediately to the Designated Safeguarding Leads and named lead for looked after children.

18.4- Private Fostering

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school and college staff through the normal course of their interaction, and promotion of learning activities, with children.

(Keeping Children Safe in Education 2025)

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's care services as soon as possible.

Where the arrangements come to the attention of the school or college (and the school or college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.

(Keeping Children Safe in Education 2025)

Such arrangements may come to the attention of BCA staff through the normal course of their interaction and promotion of learning activities with students. Private fostering arrangements will only apply to learners aged under 18 with Educational Health and Care Plans and as an educational provider, we must notify student's local authority if we are aware of any private fostering arrangements taking place to allow the local authority to check the arrangement is safe and suitable for the young person.



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18.5- Child Trafficking

Child trafficking is the recruitment and movement of children for the purpose of exploitation. It is a form of child abuse. Identifying if a child has been trafficked is not easy. Trafficked children are often hidden; they may be scared or unaware that they have been trafficked. There is a wide variety of reasons why children are trafficked to the UK, including:

- sexual exploitation work or labour exploitation
- domestic servitude in private homes criminal activity
- drugs trafficking
- illegal inter-country adoption forced marriage
- removal of organs.

Traffickers can be parents, family members, organised gangs or individuals – they can be men or women.

Schools' legal responsibilities are outlined in HM Government (2011) Safeguarding Children who may have been trafficked (2011). Schools should also refer to department of Education Statutory Guidance (2015) Children Missing Education (2015)

Schools should create an ethos that encourages all staff to feel confident in expressing concerns about a child having been subjected to possible trafficking, no matter how far-fetched they may believe this is. Concerns of this nature are regarded as child abuse and the school's child protection procedures should be followed in all cases.

Children trafficked into the country may be registered at a school for a term or so, before being moved to another part of the UK or abroad again. Schools therefore need to be alert to this pattern of registration and de-registration. This pattern has been identified in schools near ports however it could happen anywhere in the UK.

Schools need to be alert to the possibility that a child who goes missing from school, may be, or have been, a trafficked child, who is living with or is running away from an exploitative situation.

Victims of trafficking may find it difficult to speak out because:

- English is not their first language
- They are frightened of their abusers or of retribution
- They are frightened or suspicious of adults who are trying to help them
- They fear for their immigration status or fear getting a criminal record
- They may not see themselves as victims
- They have a false sense of loyalty to their abuser, including a sense of respect for elders and not wanting to get them into trouble.

It can be difficult to identify a trafficked child, but the following are possible indicators:

- children have no documents when registering with school (birth certificate or passport)
- it is unclear who the child lives with or the relationship between the child and carer is



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unclear

- the adult speaks for the child
- children look intimidated and behave in a way that does not correspond with behaviour typical of children their age
- children and young people being overly tired in school
- not being registered with a school or a GP practice, or appearing to change school and GP frequently
- symptoms of STIs or pregnancy, signs of sexual or physical assault, poor dental health
- poor school attendance with no or vague explanation/s given for absences
- receiving repeated unexplained or unidentified phone calls seen entering or leaving vehicles driven by unknown adults
- possesses money or goods not accounted for
- having a history with gaps and unexplained moves or going missing for periods
- having what appears to be a prepared story, which lacks credibility

In some cases, children may disclose exploitation, for example being made to do excessive household work or being forced to commit crime.

Preventative measures:

The Designated Safeguarding Lead should be aware of the issue and should consider running an awareness-raising session for all staff and the Governing Body, The DSL should also be aware of local protocols and procedures in response to child trafficking. The school should link with external agencies and be aware of any locally based projects or interventions. Schools should also display posters for helplines about children's concerns, including sexual exploitation or trafficking, so that they know there are other places to seek help and support if they don't feel comfortable approaching a member of staff.

Response and action to be taken:

The impact of trafficking on children's health and welfare can be considerable. Trafficked children are not only deprived of their rights to health care and freedom from exploitation and abuse, but may also not be provided with access to education or only to fragmented and interrupted schooling. In addition, the creation of a false identity with an implied criminality, together with loss of family and community, may seriously undermine their own sense of identity. The nationality or immigration status of the child does not affect a school's responsibilities to act, but bear in mind some children may be very worried about their immigration status, application or appeals. Schools can contact the NSPCC's Child Trafficking Advice Centre (CTAC) for advice or to talk through the concerns. CTAC can provide guidance and advice and make or support a referral to children's services.

Working with parents:

Trafficked children are unlikely to be living with their parents. Many trafficked children will be staying in informal fostering arrangements with unrelated adults. Often these adults will claim to be related but often don't have anything to prove this relationship where there are concerns about



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trafficking, the DSL should refer to Children's Social Care for advice and not engage with carers directly.

18.6- Domestic Abuse

Domestic abuse is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality. The harm caused to learners can be significant – through emotional and physical abuse and/or neglect. From 2006, the definition of significant harm was amended to include “the harm suffered by seeing or hearing the ill-treatment of another, in the home”.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. . The effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Therefore, if staff are aware that a learner is witnessing or hearing domestic violence, they should inform the DSL, who should in turn refer the matter to Children's Social Care team or to Children's Social Care for the borough in which the learner lives. Staff should also be alert to possible violence in relationships between students and report this to the DSL immediately.

18.6.2- Operation Encompass

Big Creative Academy is working in collaboration with the Metropolitan Police Service as part of their legal commitments under Operation Encompass.

Operation Encompass is the notification to schools/colleges that a child (under 18) has been exposed to, or involved in, any domestic incident. This includes incidents where the child/young person was not present but is part of the household. This will ordinarily be done by the start of the next school/college day.

Operation Encompass will ensure that a specially trained member of the college staff, known as a Designated Safeguarding Lead (DSL), is informed. The DSL can then use the information that has been shared, in confidence, to ensure the wellbeing of the child.

Big Creative Academy may be able to make provisions or adjustments to assist the child and their family.

More information on Operation Encompass: <https://www.operationencompass.org/>

18.7- Young Carers

In many families, learners contribute to family care and wellbeing as part of normal family life. A young carer is a child who is responsible for caring on a regular basis for an adult or a sibling who has illness or disability. Caring responsibilities can significantly impact upon a child's health and development. Reasonable adjustments can be considered for students who have caring



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responsibilities at home. Staff must report any concerns to the DSLs who will consider referrals to Children's Social Care, Early Help or the young person's Young Carer's programme in their local authority for a young carer who is:

- Unlikely to achieve or maintain a reasonable standard of health or development because of their caring responsibilities
- At risk of harm through abuse, exploitation or neglect

18.8- Missing Persons/Young Runaways

Some young people are pushed away from their home by factors that make an environment difficult to live in, such as problems at home, difficult relationships, family breakdown and maltreatment or abuse, problems at the Academy including bullying and personal problems including mental health issues. Other young people are pulled away to be near friends and family or following grooming by adults for sexual exploitation or trafficking.

The Academy will support learners by enabling them to understand the dangers of running away and encourage them to seek support rather than run away; some learners run away because they feel there is no other option. Learners need to know where they can access help if they are thinking of running away and what alternatives are open to them.

The Academy is well placed to advise young people about the dangers of running away and to point them to available support. If Academy staff become aware of a young runaway, they should ensure they inform their Police Liaison Officer and/or Children's Social Care.

Should a young person be suspected as missing the Academy will fully co-operate to determine the safety of the young person. If a young person is reported as missing to the Academy by the parent, carer or guardian we will advise that this should be reported to police. If there is refusal to do so by the parent, carer or guardian the Academy will report the missing young person to the police.

18.8.1- Young People Absent from Education

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

(Definitions taken from 'Keeping Children Safe in Education 2025')



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Periods of absence for 2 weeks or more will be reported to the student services and safeguarding department to consider whether there are any safeguarding risks or concerns relating to that student, ensuring that support is provided to the young person and their family. Students with regular absences may be referred to the Academy's 'at-risk' register where intervention is discussed and implemented by the relevant departments to support students to access their education.

When a student has had a period of absence of a week, their Tutor will contact parents/carers to inform them of the absence and to ascertain whether any support is required. This contact with parents/carers should be logged on internal systems. If a student is absent for a period of 2 weeks, a letter will be sent home outlining concerns around absence, along with a referral to student services.

If a student has not attended their sessions for 4 weeks or more, the student will be un-enrolled from their course at Big Creative Academy. Students who have been un-enrolled can receive support, advice and guidance on their next steps with our recruitment/careers team.

For more information on please refer to Big Creative Academy's Attendance & Punctuality Policy.

18.9- Fabricated illness

Fabricated or induced illness (FII) in children is a difficult and complex subject but the Academy can play a key role in recognising concerns that may relate to this rare form of child abuse. Fabricated/induced illness occurs when a child is presented for medical attention with signs or symptoms which have been fabricated or induced by the child's carer. Research shows that it is usually, though not exclusively, carried out by a female carer, usually the child's mother.

FII includes:

- Fabrication of signs and symptoms of illness, including fabrication of a child's medical history
- Fabrication and falsification of medical records, letters and test results
- Deliberately inducing illness in the child

Although symptoms may not be visible in a school context, the Academy will create an ethos that encourages all staff to feel confident in expressing concerns of this nature no matter how far-fetched they may believe they are. Fabricated or induced illness is a form of child abuse and it should be included in schools' safeguarding and child protection policies, procedures and training.

Schools' legal responsibilities are set out in Safeguarding Children in whom Illness is Fabricated or Induced (HM Government, 2008).

Preventative measures



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The Academy promotes an ethos which encourages children and young people to approach staff with any concerns they may have.

Recognition of possible signs and indicators

The signs and indicators of FII can be ambiguous. Academy staff are particularly well placed to notice outward signs of harm or to observe if a child is repeatedly unwell for no apparent reason.

The following factors may alert you to the possibility FII:

- Frequent and unexplained absences from school, and from particular lessons/activities, especially PE
- Regular absences to keep a doctor's or a hospital appointment, where no reason has been there has been given.
- Regular failures to keep medical and other health related appointments e.g. opticians, physiotherapists.
- Refusal of permission for the Academy medicals and/or other health related checks (e.g. hearing).
- Repeated claims by the parent/s that a child is frequently unwell and requires medical attention for symptoms which are vague or difficult to diagnose.
- Frequent illness, exaggeration of symptoms or excessive treatments or ailments not consistent with the child's general health or, in relation to a child's disability.
- Parent/carer alleges the child has psychological difficulties.
- The child's supposed symptoms are only mentioned when the parent or carer is present.
- The parent/carer appears to have an unusually high level of knowledge about medical matters.
- Documents or other sources indicate that the parent/carer has changed doctors frequently, and/or has visited different hospitals for the child's treatment.

Where a teacher or other member of staff has reasonable cause to believe that a child is at risk from, or is the subject of, FII, child protection procedures will apply. Staff should refer any child welfare concern to the designated safeguarding lead.

The DSL should refer to guidance given by the local children's safeguarding partnership and work within the agreed procedures.

We will:

- develop a chronology of concerns by collating a record of absences and, where known,



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the reasons given by the carer for the absence. Where attendance levels fall below threshold, the Academy will liaise with Education Welfare Officers to aim to improve attendance. Liaise with health professionals involved with the child, including School Nursing Services, GP and other therapy services.

- Ensure any visits the child makes to the school medical room are logged and cross referenced to any concerns reported by other staff or the illness described by the parent/carers.
- If the child has siblings, the DSL should ascertain whether similar concerns or patterns of illness or absence apply to other children in the family.
- The academy should not advise parents/carers about the suspicion of fabricated illness as there is evidence that this can increase the harm and it may also damage evidence. The designated safeguarding lead should discuss with Children's Social Care what the parent/carers will be told, by whom and when.
- The designated safeguarding lead should be invited to attend any strategy discussions or child protection conferences.

Information sharing

In suspected cases of FII it is especially important that information is shared between relevant agencies. Schools should follow the protocols set out by the Local Safeguarding Children's Partnership and the DSL should seek advice from Children's Social Care about what information will be shared with parents/carers.

19- Sexual threats

19.1- Child Sexual Exploitation (CSE)

Occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.



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There are four likely options to deal with a report of child on child sexual violence or sexual harassment:

- Manage the situation internally
- Early help
- Referrals to social care
- Report to the Police

Big Creative Academy operates a zero tolerance towards sexual violence and sexual harassment and will choose the most appropriate option in accordance with the risk assessment. All care will be taken to support both the victim and the perpetrator.

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship.

The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The Academy includes the risks of sexual exploitation in the Wellbeing curriculum.

A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

The MASE is the Multi-Agency Sexual Exploitation meeting, which is held on a monthly basis and is co-chaired by Children's Social Care and the Metropolitan Police.

The MASE has two purposes:

- For professionals to refer young people who are at risk of or are experiencing sexual exploitation: who are subject to a plan (Child Protection, Multi-agency or Child in Need) but for whom the risks are not decreasing and specialist advice or support is required
- To refer information/intelligence about possible venues/people involved in sexual exploitation. This information will then contribute to developing a strategic overview and



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understanding of sexual exploitation in Waltham Forest

19.2- Child on child sexual violence and sexual harassment

The Academy follows government advice found at Sexual violence and sexual harassment between children in schools and colleges.

The Academy's initial response to a report of child on child sexual violence or harassment is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

As per all other concerns, this should be reported immediately to the DSL.

Immediate Response to a Report of Sexual Violence/Harassment:

When a learner discloses an allegation of sexual violence and/or sexual harassment from their peer this must be immediately shared with BCA Designated Safeguarding Lead who will meet with the victim to understand the nature of the incident.

The DSL will consider any report of sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school or college.

All staff must ensure that all victims are being taken seriously and that they will be supported and kept safe. When dealing with a response of sexual violence/harassment it is vital that the Academy takes into consideration the wishes of the victim, how they would like to move forward and to assure all victims that their allegation is being taken seriously.

All staff must explain to students that the law is in place to protect them and not criminalise them.

BCA will strongly consider the following advice:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school or college's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is an alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning?;



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- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or school or college?;
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- Intra-familial harms, and any necessary support for siblings following incidents
- The importance of being part of statutory safeguarding discussions.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. Big Creative Academy will follow general safeguarding principles as per Keeping Children Safe in Education. Immediate consideration will be given as to how best to support and protect the victim and the alleged(s) (and any other children impacted).

The starting point regarding any report should always be that sexual violence and sexual harassment is never acceptable and it will not be tolerated. It is especially important, not to pass off any sexual violence or sexual harassment as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable and unsafe environment for children.

Risk Assessment:

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment.

Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and will be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform the schools or



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college's approach to supporting and protecting their pupils and students and updating their own risk assessment.

(Definitions taken from 'Sexual violence and sexual harassment between children in schools and colleges 2021')

19.3- Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

The DSL will work with students (perpetrator and victim) and their families if aged under 18 years old of any upskirting incidents to ensure that appropriate support and education around this type of behaviour is implemented. Referrals to Children's Social Care and the Police may be appropriate for further investigation/support.

19.4- Sexting/ Youth Produced Imagery

Sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

When an incident involving youth produced sexual imagery comes to a school or college's attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

When a learner discloses an allegation of sexual violence and/or sexual harassment from their peer this must be immediately shared with Designated Safeguarding Lead who will meet with the victim and accused learner to understand the nature of the incident.

Staff members must ensure that all victims are being taken seriously and that they will be supported and kept safe. When dealing with a response of sexual violence/harassment it is vital



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that staff take into consideration the wishes of the victim, how they would like to move forward and to assure all victims that their allegation is being taken seriously.

The DSL will strongly consider the following advice:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty;
- Is the alleged incident is a one-off or a sustained pattern of abuse
- Are there ongoing risks to the victim, other children, adult students or school or college staff and other related issues and wider context.
- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them;

Risk assessments should be recorded (written or electronic) and should be kept under review.

At all times, the school or college should be actively considering the risks posed to all their pupils and students and putting adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

(Definitions taken from 'Sexual violence and sexual harassment between children in schools and colleges May 2018).

Further guidance on how BCA will respond to allegations of sexting and youth can be found at:

- <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for->



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- [education-settings-working-with-children-and-young-people](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

19.5- Harmful sexual behaviour (HSB)

“Sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person or adult.”

(Definition from <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges#definitions>)

Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB).

The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face to face and can also occur simultaneously between the two.

When considering HSB, ages and the stages of development of the children are critical factors.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Responding to Harmful Sexual Behaviour:

Big Creative Academy staff members will report all HSB concerns immediately to the DSL and/or Deputies. The DSL will review the case and consider whether any involved students (both victim and perpetrator) have any needs that may make them particularly vulnerable, such as; learning difficulties, disabilities, looked-after/previously looked/after, whether they are supported by social care/YOT etc.

The DSL will also consider whether the behaviours displayed are consensual and part of the young person’s ‘normal’ development, or whether these behaviours are considered violent, concerning or abusive. Parents/guardians will be contacted to inform them of our



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concerns and the DSL will work with both victim and perpetrators and possibly external services (such as the police or Children's/Adult's social care) to provide appropriate and timely support.

Risk assessments may also need to be considered to ensure that learners are kept safe whilst on-site.

The victim may have been criminally exploited even if the activity appears consensual. CSE and HSB does not always involve physical contact; it can also occur through the use of technology.

20- Criminal behaviours

20.1- Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

20.2- Gang Violence and Gang Grooming

As part of the teaching and wellbeing offer Academy staff are well placed to pick up signs of anti-social behaviours, aggression, bullying and gang activity amongst young people and identify those at risk of harm as victims and/or the perpetrators.

Poor academic achievement is one of the most consistently- reported risk factors found to increase the likelihood of violent behaviour and crime.

Academy staff should follow the Academy's behaviour management and anti-bullying and harassment procedures and if necessary work collaboratively with external bodies such as Connexions and Reality Around Gangs, when managing gang related issues on site.

20.3- County lines exploitation and serious youth crime



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County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

(Definition taken from Keeping Children Safe in Education 2025)

Indicators:

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. Crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection; • are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.



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One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.
- Class A drug users being targeted so that gangs can takeover their homes (known as 'cuckooing').

The Academy understands that county lines exploitation is widespread, with gangs from big cities including London, Manchester and Liverpool operating throughout England, Wales and Scotland. Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Social isolation or social difficulties;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other people involved in gangs;
- Having a physical or learning disability;
- Having mental health or substance misuse issues;
- Being in care (particularly those in residential care and those with interrupted care histories).

(Definitions taken from Criminal Exploitation of children and vulnerable adults: county lines guidance July 2017)

Serious Youth violence preventative measures:



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The DSL of the Academy works closely with Waltham Forest Safer Schools Officer to help identify and support learners who are at risk of/involved with serious youth violence.

The Academy may carry out knife arch operations throughout the academic year with the support of Waltham Forest metropolitan police.

The Academy recognizes that learners may carry weapons for a variety of reasons and we are dedicated to supporting and educating our learners on the potential risks involved when carrying a bladed weapon.

If a learner is to bring a bladed weapon onto the premises we will work closely with them, their parents/carer and police to ensure that the incident has been reported to the relevant local agencies and to ensure that appropriate intervention and support is put in place.

The Academy security team carry out random searches of learners to ensure that they are not carrying any offensive or dangerous weapons, any weapons found will be reported to and seized by the Metropolitan Police with a likely referral to the local authority Children's Services/ Bronze panel.

20.4- Child on child abuse (Appendix B)

Big Creative Academy recognises that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

Children can abuse other children. This is generally referred to as child on child abuse and can take many forms.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')



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- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be 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 to 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 the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

(Keeping Children Safe in Education 2025)

How is Risk Minimised?

Before enrolment, prospective learners are given the opportunity to state whether they have a criminal conviction.

Learners' names can be sent to our Metropolitan Police Schools Officer who can run a background check on learner with details of all previous convictions. Head of Curriculum/DSL will then complete a risk assessment and discuss any concerns with SLT as to whether the Academy can accept the learner who could potentially pose a threat to other young people and staff in the building.

How will BCA respond to allegations?

The Academy will respond to allegations by using the steps in our disciplinary policy, taking into account case-by-case and note the need for contextual safeguarding for response. The Academy understands that child on child abuse must never be tolerated as 'banter' and will be investigated with utmost importance.

How BCA will support victim and perpetrator?

The Academy ensures to listen and take into account the wishes of the victim/victims and perpetrator in moving forward. Referral to DSL/Student Services department will establish what support will be offered to both victim and perpetrator ensuring that the child's education is not



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compromised. Cases may be referred to external organisations such as local authority social care in order to provide the victim/perpetrator with the support needed.

The Academy will investigate allegations in line with our disciplinary procedure. Criminal allegations will be reported to the police but the Academy must not wait for the outcome of police investigation to determine internal disciplinary action (as this could be detrimental to the young person receiving education on-site).

How are incidents recorded?

All safeguarding incidents are recorded and logged securely online on a password-protected system.

21- Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to follow their school or college's child protection policy and by speaking to the designated safeguarding lead or a deputy.

(Keeping Children Safe in Education 2025)

Response to mental health concerns:

If a staff member becomes aware that a learner may be experiencing mental health concerns this should be reported to the Student Services department and/or DSL. Student services and/or DSL will have further conversations with the young person to better understand their current concerns/difficulties. Staff also acknowledge that mental health concerns could be an indicator that a young person has experienced abuse, neglect or exploitation.

Support for Mental Health Difficulties:

Mental Health Officer (based on-site)

Referrals to BCA's Mental Health Officer may be appropriate for general mental health support; if a learner requires a more tailored approach/assessment/ clinical support, referrals to the young



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person's mental health team in borough will be considered (CAMHS, IAPT, GP referrals, NHS Crisis Support).

Anna Freud Early Support Service

Big Creative Academy are pleased to offer external referral routes for students who are experiencing mild to moderate mental health difficulties via the Anna Freud Early Support Service. Students can self-refer to this service to receive either:

- 6-8 sessions of solution-focused mental health support via video calls with a trained practitioner
- a single-session consultation for students who may not require long-term support

Students can also sign-up to watch on-demand webinars focusing on several topics that relate to their mental health and emotional wellbeing.

Art Therapy

Big Creative Academy's Mental Health Strategy includes providing a trauma-informed approach to supporting our students. Referrals to the Art Therapist can be made via student services.

More information included in Big Creative Academy's Mental Health Strategy.

22- APPENDIX A: PREVENT STATEMENT

At Big Creative Academy we are fully aware and committed to the on-going protection and safety of our pupils, staff and wider community in accordance with DfE guidance 'Working together to Safeguard Children' (2023), 'Keeping Children Safe in Education' (2025) and the PREVENT duty Guidance (March 2024). An integral part of that work relates to the governments PREVENT strategy and the duties it places on education institutions.

Our setting is committed to providing a secure environment for pupils, where children feel safe and are kept safe. All adults in our school recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not.

We acknowledge that the PREVENT objectives are:

- tackle the ideological causes of terrorism
- intervene early to support people susceptible to radicalisation
- enable people who have already engaged in terrorism to disengage and rehabilitate

(PREVENT Duty Guidance March 2024)

Reporting Concerns



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Staff are instructed to report any concerns relating to abuse, neglect, exploitation, radicalisation and extremism directly to the safeguarding team via our normal referral and reporting procedures (speaking immediately to the DSLs or Deputy with notes documented on CPOMS).

Staff are aware that radicalisation can occur both online and offline.

Staff will be alert to issues including:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Pupils accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendship or actions and requests for assistance
- Use of extremist or 'hate' terms to exclude others or incite violence
- Have an awareness of students who may be susceptible to an extremist ideology
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- The importance of promoting British values through the curriculum.

Students Susceptible to Radicalisation

Some learners may appear to be at risk or susceptible to radicalisation into terrorism without showing a clear ideology. Individuals increasingly adopt a mix of ideas from different ideologies into their grievance narratives.

This could include individuals who:

- show an interest in multiple extremist ideologies at the same time
- switch from one ideology to another over time
- target a 'perceived other' of some kind (perhaps based on gender or another protected characteristic), but do not otherwise identify with one particular terrorist ideology or cause - for example, involuntary celibates (incels) who direct their anger mainly at women
- are obsessed with massacre, or extreme or mass violence, without specifically targeting a particular group - for example, high school shootings
- show an interest in conspiracy theories which can act as gateway to radicalised thinking,



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common themes include:

- religious or ethnic superiority
- antisemitism
- misogyny
- anti-establishment and anti-LGBT grievances
- may be susceptible to being drawn into terrorism out of a sense of duty, or a desire for belonging, rather than out of any strongly held beliefs

(Understanding and identifying radicalisation risk in your education setting 2023)

How learners become susceptible to radicalisation

There is no single way of identifying whether a learner is likely to be susceptible to radicalisation into terrorism. The process of radicalisation is different for every individual. It can take place over a long period, or it can be very quick.

Learners who are vulnerable to grooming for sexual exploitation, criminal exploitation or county lines, may also be vulnerable to radicalisation. Factors could include things like being a victim or witness of crime, abuse or bullying, or having personal or emotional difficulties.

Adverse childhood experiences, combined with specific influences from family and peers or online connections, may make someone more susceptible to radicalisation.

Extremist influences could include, but are not limited to:

- Family members having direct contact or involvement with extremist or terrorist groups
- Staff members of an education or community setting promoting an extremist ideology
- Peers promoting an extremist ideology or sharing extremist material
- Access or exposure to online extremist material via social media or the internet- for example, propaganda including pictures, videos, blogs and fake news
- Exposure to extremist, terrorist or other violent activity in overseas settings
- Access or exposure to extremist leaflets, magazine or stickering
- Exposure to extremist groups hosting marches, protests or stall

(Understanding and identifying radicalisation risk in your education setting 2023)

Risk Factors

There are a number of risk factors that can contribute to an individual adopting extremist ideology. Often, there are several risk factors present that, seen together, can cause concern.

Push factors may include a learner feeling:

- Isolated
- They do not belong
- They have no purpose
- Low self-esteem



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- Their aspirations are unmet
- Anger or frustration
- A sense of injustice
- Confused about life or the world
- Real or perceived personal grievances

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

- Offering a sense of community
- Promising fulfilment or excitement
- Making the learner feel special and part of a wider mission
- Offering a very narrow, manipulated version of an identity that often supports stereotypical gender norms
- Offering inaccurate answers or falsehoods to grievances
- Encouraging the use of hatred and violent actions to get justice
- Encouraging ideas of supremacy

(Understanding and identifying radicalisation risk in your education setting 2023)

By continually developing our leadership and accountability practices, staff training opportunities, referral systems and management of those referrals, we strive to demonstrate a pro-active and diligent approach to this aspect of our responsibilities as educators and safe-guarders.

Aligned with a consistent delivery of a broad and balanced curriculum and use of the Local Authority-approved Self-Assessment framework, we strive to protect our students - and the wider community - against the threats of radicalisation and extremism, through the promotion of both fundamental values and cohesion amongst our communities.

Information and Support for DSLs

We also recognise that further information and support is available from the Multi-Agency Safeguarding Hub (0208 496 2310), the Local Authority's Community Safety Team (02084963000) and the Waltham Forest PREVENT Team Prevent@walthamforest.gov.uk.

The self-assessment framework referenced in this policy can also be found on the Waltham Forest Education Network The Hub, using the following link: <https://thehub.walthamforest.gov.uk>

23- APPENDIX B: GUIDANCE ON HOW TO SPOT INDICATORS OF ABUSE

This appendix has been adapted from information provided by the NSPCC.



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Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child either directly by inflicting harm, or indirectly, by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them; or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

These definitions and indicators are not meant to be definitive, but only serve as a guide to assist you. It is important too, to remember that many children may exhibit some of these indicators at some time, and that the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death or the birth of a new baby in the family or relationship problems between parents/carers. In assessing whether indicators are related to abuse or not, the authorities will always want to understand them in relation to the child's development and context.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Signs of abuse

Recognising child abuse is not easy. It is not your responsibility to decide whether or not child abuse has taken place or if a child is at significant risk of harm from someone. You do however, have both a responsibility and duty, as set out in your organisation's child protection procedures, to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

Definitions

There are five types of child abuse as defined below in accordance with UK Government guidance, Working Together to Safeguard Children (2023). All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Definitions of Types of Abuse

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

Most children will collect cuts and bruises as part of the rough-and-tumble of daily life. Injuries should always be interpreted in light of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g.



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elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g., cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern, although this can be more complicated with burns, as these are often delayed in presentation due to blistering taking place sometime later

The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks,
- multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example in hot weather
- depression
- withdrawn behaviour
- running away from home.

Emotional Abuse: emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may feature age- or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse can be difficult to measure, as there are often no outward physical signs. There may be a developmental delay due to a failure to thrive and grow, although this will usually only be evident if the child puts on weight in other circumstances, for example when hospitalised or away from their parents' care. Even so, children who appear well-cared for may nevertheless be



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emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- neurotic behaviour e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm (see Self Harm Policy)
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress

Sexual Abuse: sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact including either penetrative or non-penetrative acts such as kissing, touching or fondling the child's genitals or breasts, vaginal or anal intercourse or oral sex. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the child's behaviour that may cause you to become concerned, although physical signs can also be present. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares



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- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- sexting (also known as youth produced sexual imagery)
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults
- initiation/hazing type violence and rituals

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse.

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

Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing; shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children.

The physical signs of neglect may include:

- constant hunger, sometimes stealing food from other children
- constantly dirty or 'smelly'
- loss of weight, or being constantly underweight
- inappropriate clothing for the conditions.

Changes in behaviour which can also indicate neglect may include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends



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- mentioning being left alone or unsupervised.

Child on child abuse: may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those abused to defend themselves. It can take many forms, but the three main types are physical (e.g. hitting, kicking, theft), verbal (e.g. racist or homophobic remarks, threats, name calling) and emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).

The damage inflicted by child on child abuse can frequently be underestimated. Evidence of child on child abuse should never be dismissed as normal adolescent aggression (the idea that ‘boys will be boys’, etc.), ‘banter’, or as harmless. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm).

All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying (child on child abuse) strategies.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be 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 to 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 the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

(Keeping Children Safe in Education 2025)

A child may encounter attacks that are:

- physical: pushing, kicking, hitting, pinching and other forms of violence or threats
- verbal: name-calling, sarcasm, spreading rumours, persistent teasing (online or



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in-person)

- emotional: excluding, tormenting, ridiculing, humiliation (online or in-person).

Persistent child on child abuse can result in:

- depression
- low self-esteem
- shyness
- poor academic achievement
- isolation
- threatened or attempted suicide

Signs that a child may be being abused by a peer can be:

- coming home with cuts and bruises
- torn clothes
- asking for stolen possessions to be replaced
- losing dinner money
- falling out with previously good friends
- being moody and bad tempered
- wanting to avoid leaving their home
- aggression with younger brothers and sisters
- doing less well at school
- sleep problems
- anxiety
- becoming quiet and withdrawn

Children who may be particularly vulnerable:

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

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs



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- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Where children need a social worker, further care should be given towards their safeguarding. Incidents such as unauthorised absence or missing education should be paid particular attention. Increased care should be given to promoting the welfare of CIN/ CPP students, such as further pastoral and academic support from staff.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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



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Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Children requiring mental health support. All staff have an important role to play in supporting the mental health and wellbeing of our learners. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

All staff should refer to Mental Health First Aid training to identify possible mental health problems and should follow the same procedure as reporting any safeguarding issue if they suspect a learner is suffering from a mental health issue.

Sexual Abuse and Sexual Harassment

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- upskirting

Meaning: Unwanted conduct of a sexual nature (online/offline, in and out of school/college)

Likely to:

- Violate a child's dignity, make them feel intimidated, degraded, humiliated or create a hostile, offensive or sexualised environment.
- Can include:
 - Sexual comments
 - Jokes/taunting
 - Physical behaviour
 - Online sexual harassment



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- Consensual and non-consensual sharing of nude/semi-nude images
- Upskirting
- Sexualised online bullying
- Unwanted sexual comments/messages
- Sexual exploitation

Sexual Violence

RAPE – intentional penetration of vagina, anus or mouth of another person.

Assault by Penetration – intentional penetration of the vagina or anus with a part of her/his body or anything else.

Sexual Assault – intentional sexual touching. Note: assault covers a wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom, breast, genitalia without consent, can still constitute sexual assault.

Causing someone to engage in sexual activity without consent – intentionally causing another person to engage in an activity. An example, forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Inappropriate Sexual Behaviour

Can be inappropriate socially, in appropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration.

The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:
- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society’s standards for what is being proposed
- Awareness of potential consequences and alternatives



- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

Indicators of Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including County Lines.

This is not an exhaustive list of the indicators of CSE, CCE or County Lines. Practitioners should be aware that many of the indicators might be common to more than one form of exploitation. This is because the driving forces behind different forms of exploitation are often similar, and the same grooming models used to coerce, intimidate and abuse children for sexual and criminal exploitation, for example, are also liable to be used to groom individuals for County Lines.

Underage sexual activity	Inappropriate sexual sexualised behaviour or	Sexually risky behaviour / 'swapping' sex		Regular school absence / truanting	Receiving unexplained gifts or gifts from unknown sources	Involvement in crime, police involvement
Having older boyfriends or girlfriends	Child Sexual Exploitation	Repeated sexually transmitted infections	← →	Gangs, gang fights, gang membership	Child Criminal Exploitation	Having unaffordable new things or expensive habits
Changes in the way they dress	Youth-produced sexual imagery (etc)	In girls, repeated pregnancy, abortions, miscarriage		Hanging out with groups of older people, anti-social groups or other vulnerable peers	Involved in abusive relationships, intimidated and fearful	Drug or alcohol misuse

↑ ↓ **Exploitation** ↑ ↓

Going missing from home or school	Going to hotels or other unusual locations to meet friends	Seen at known places of concern
Recruiting other people to exploitative situations	County Lines	Moving around the country, appearing in new places, not knowing where they are
Getting in / out of cars driven by unknown adults	Having multiple mobile phones and worrying about losing contact	Contact with known perpetrators



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24- APPENDIX C: KEEPING SAFE – INFORMATION TO VISITORS

Keeping Safe – Big Creative Academy

Safeguarding and Health and Safety Information for Visitors and Contractors provided at reception:

Welcome to Big Creative Academy. Please read this leaflet about keeping safe when visiting the site. Big Creative Academy expects all visitors and contractors to:

- Sign into the visitors' book.
- Wear their visitor's badge at all times and return this to reception/security when leaving the building.
- Report any hazards or suspicious activities.
- Report all incidents that occur on Academy grounds to the Building Manager.
- Act in a way that promotes the Academy's values (kindness, respect, inclusivity, authenticity, integrity).
- Report any concerns relating to a student to the Designated Safeguarding Leads/Deputies

Safeguarding

Big Creative Academy is committed to keeping its learners safe. Big Creative Academy believes that everyone including young people and vulnerable adults have rights as individuals and should be treated with respect and dignity.

If you have any safeguarding concerns about our young people, it is your responsibility to report these concerns to one the Academy's Safeguarding Team:



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Designated Safeguarding Leads:

Charlotte Perchard
Tel: 0208 498 3300
E: Charlotte.perchard@bigcreative.education

Amina Sheta
Tel: 0208 498 3300
E: Amina.sheta@bigcreative.education

Deputy Designated safeguarding leads:

Hyacinth Slowley
Tel: 0208 498 3300
E: hyacinth.slowley@bigcreative.education

Faye Tilyard
Tel: 0208 498 3300
E: faye.tilyard@bigcreative.education

- All visitors must wear the visitor's badge provided by reception and sign in and out of their visit.
- All visitors must sign in at reception confirming that they understand and will adhere to the safeguarding policy
- An adult without a badge will be accompanied to BCA's reception to confirm they have signed in.
- Visitors must be accompanied at all times by a member of BCA staff.

Unsupervised visitors:

If your visit involves unsupervised contact with young people, you will be asked to show the photographic ID badge provided by your employer and written confirmation that appropriate DBS checks have been made.

Depending on your role and the organisation you are from you may be required to show your Enhanced DBS Certificate.

We will note down the DBS number and date issued but will not make a copy of it.

You will also need to read the school's Guidance for Staff on Appropriate conduct and Part 1 of the DFE's Guidance, 'Keeping Children Safe in Education'.

BCA's safeguarding Policy is available on our website.



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If you have ANY concerns about a child's welfare or wellbeing or have a concern about the behaviour of any adult within the college towards a child you must discuss your concerns without delay with the Designated Safeguarding Lead (Charlotte Perchard, Amina Sheta) or Deputy Safeguarding officers (Hyacinth Slowley or Faye Tilyard). If this is not possible, you should speak to a member of the senior leadership team.

Remember it is important to share your concerns even if you are unsure.

Please never:

- Photograph a child without BCA's permission
- Never use your personal mobile phone in areas used by young people
- Ignore inappropriate behaviours towards children either by other children or adults
- Share personal details with a child
- Meet or contact the student out of college including by text, email, Facebook or other social media or give a child a lift home
- Discuss the school, children or adults working within BCA on social media
- Make inappropriate comments to a child including racist, homophobic, sexist or sexualised comments
- Give gifts to a young person (unless part of BCA's agreed rewards policy or with the agreement of your line manager) or show them preferential treatment

Fire Evacuation and Fire safety

If you discover a fire, you should activate the nearest break glass point. If the fire alarm sounds continually, you are to evacuate the building immediately. Follow the Fire Evacuation Signs to the appointed assembly point.

First Aid

In case of an accident or incident please contact either Reception or the Security Desk who will arrange for a first aider to attend.

General Health and Safety Points

- Please do not leave any of your possessions unattended
- If you see any unattended item or items of lost property, please contact Reception
- If you notice anything that is unsafe, hazardous, broken or requires maintenance please report this to Reception who will arrange for the Buildings Manager to attend
- If you are given keys to use for a room, please ensure that it is locked when you leave and the keys returned to Reception
- If you have any other enquiries, please ask a member of staff who can be identified by the black lanyard they wear

Contractors Specific Information



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All contractors must have a Permit to Work when working on Big Creative Academy premises if the work involves working at height, working on high voltage electrical systems, working directly on the mains system or work that affects the infrastructure of the Academy. Permits can be obtained from the Buildings Manager. Contractors are expected to follow a safe system of work at all times.

25- APPENDIX D: Allegations against staff and volunteers (ASV)

If there are any concerns that a practitioner (including supply teachers) or volunteer has caused harm (emotional, physical, sexual, neglect) to a child, this represents an allegation against staff and volunteers.

All allegations against staff (including supply teachers) and volunteers must be reported to the principal / Principal in the first instance. The person against whom the allegation is made should not be notified at this point.

The full procedures for dealing with allegations against staff can be found in Part 4 of Keeping Children Safe in Education 2025, and Part 7 of the London Child Protection Procedures 2017.

Initial Action by person receiving or identifying an allegation or concern:

- Whilst allegations may be false, malicious or misplaced, they may also be founded in truth; all staff must report allegations even if they reasonably believe them to be false.
- All allegations must be investigated properly, in line with agreed procedures and outcomes recorded.
- Staff must treat all allegations seriously and keep an open mind.
- All low-level concerns should be discussed and decided upon in conjunction with LADO in congruence with local procedures.
- Make a written record of the information, including the time, date and place of incident/s, persons present and what was said and sign and date this.
- Immediately report the matter to the principal/proprietor.
- Do not share allegations with any other member of staff, including the subject of the allegation.
- If the allegation is against the principal, staff must report to chair of governors / trustees.
- If there is a lack of faith in the safeguarding governance, all staff can contact the local authority's Designated Officers (also known as LADOs) directly, without delay: 020 8496 3646 / lado@walthamforest.gov.uk.



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Threshold for statutory LADO involvement

As required by Working Together to Safeguard Children 2023, all allegations in respect of an individual who works at the school that fulfil any of the following criteria will be reported to the Designated Officer in the Local Authority (LADO) within one working day:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Child / children (victims)

If children are identified as victims of harm, they must be protected from harm. If children are believed to have suffered / likely to suffered significant harm, they must be referred to MASH.

Concerns must be discussed with children's parents at the earliest opportunity; they must maintain confidentiality during the investigation phase of the LADO process.

Subject of allegations

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

BCA will appoint a named contact person for the subject of the allegation; they will be advised to seek advice / support from a union rep; the employee assistance programme information will be shared.

Big Creative Academy as employers have a duty of care to their employees. Effective support for anyone facing an allegation should be provided

Where the Big Creative Academy are not the employer of an individual, they still have responsibility to ensure allegations are dealt with appropriately, liaising with relevant parties (this includes supply teachers and volunteers, Supply teachers

Big Creative Academy will ensure allegations against supply teachers are dealt with properly. In no circumstances should a Big Creative Academy decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.



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Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

Big Creative Academy will take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

Supply teachers, whilst not employed by the Big Creative Academy, are under the supervision, direction and control of the governing body or proprietor when working in the school or college.

They should be advised to contact their trade union representative if they have one, or a colleague for support.

The ASV meeting arranged by the LADO will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the school during the investigation.

When using an agency, Big Creative Academy should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Suspension

Suspension is not the default option and alternatives to suspension will always be considered. It is usually preferable if the child/ren involved in allegation and the practitioner in question are not in contact.

In some cases, staff may be suspended where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, the school will provide support and a named contact for the member of staff, who will be in touch periodically as agreed upon suspension.

Confidentiality

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law.

Publication includes verbal conversations or writing, including content placed on social media sites.

In accordance with Keeping Children Safe in Education 2025, the college will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.



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Non-recent / historical allegations

Allegations concerning staff who no longer work at the school or historical allegations will be reported to the Police.

False Allegations

It is relatively rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. If, following investigation, it transpires that a child has made a false allegation, there may be other concerns regarding their welfare that may need to be unpicked or assessed.

If an adult makes a false allegation and they are employed, this will result in disciplinary procedures. If an individual makes false allegation and police are involved, they may charge them with 'wasting police time' or 'perverting the course of justice'.

Behaviour in Personal Life

As well as concerns related to conduct towards children, practitioners must be alert to their behaviour and events occurring in their private life. For example, if practitioners' own children become subject to child protection investigations, or if they exhibit worrying violent or sexual behaviour that could impact on their suitability to work with children.

Disqualification

Early Years & Childcare staff:

Under Disqualification under the Childcare Act 2006, as amended 31/08/18, disqualification by association still applies to practitioners working in schools with children up to and including reception during the school day.

For staff who work in childcare provision or who are directly concerned with the management of such provision, the school needs to ensure that checks are carried out to ensure that they are not disqualified under the Childcare (Disqualification) Regulations 2009.

Relevant / identified staff must self-declare that they are not disqualified.

All Staff:

All practitioners must be alert to the amended guidance on disqualification which is no longer only in relation to staff working with children under 8 years. Their relationships and associations (including online) may have an implication for the safeguarding of pupils, and if there are concerns about that, practitioners must inform school.

All staff should be alert to the fact that they are responsible for alerting school if their circumstances change.



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School will retain records of self-declarations on the Single Central Record.

Abuse of position of trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

Such a relationship will nonetheless always be viewed as a significant safeguarding concern and would constitute a reason for dismissal and referral to DBS for safeguarding reasons.

LADO Outcomes

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated** allegations
There is sufficient evidence to prove the allegation that a child has been harmed or there is a risk of harm. If the facts of the incident are found to be true but it is not found that a child has been harmed or there is a risk of harm, then consideration should be given to deciding that the outcome is 'unsubstantiated' or 'unfounded'.
- **Malicious**
There is enough evidence to disprove the allegation and there has been a deliberate act to deceive. The police should be asked to consider what action may be appropriate in these circumstances.
- **False allegations**
There is enough evidence to disprove the allegation, however, there is no evidence to suggest that there was a deliberate intention to deceive. False allegations may be an indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the employer, in consultation with the LADO, should refer the matter to LA children's social care to determine whether the child needs services, or might have been abused by someone else.
- **Unsubstantiated** allegations
There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.



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- **Unfounded**

The additional definition of 'unfounded' can be used to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

The Chair of the meeting / discussion should make a record of the agreed outcome and forward this to the employer.

References in cases where the allegation is false, unsubstantiated or malicious
Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references.

A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference unless specifically asked for in a reference proforma. Please seek HR advice in this instance.

Record keeping in relation to the outcome of an investigation

Details of allegations that are found to have been malicious should be removed from personnel records.

For all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate.

It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period.

The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

DBS Referrals

BCA has a legal duty to refer any person engaged to work in regulated activity in [school / college] where the allegation has been substantiated, or where harm test has been met, irrespective of whether another body has made a referral to the DBS in relation to the same person; failure to do so is an offence.



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DBS referral can take place at any time during the Allegations / Disciplinary process – it should take place at the earliest stage possible. There could be times when you consider that you should make a referral in the interests of safeguarding children or vulnerable adults even if you have not removed the person from working in regulated activity; this could include acting on advice of the police or a safeguarding professional, or in situations where you don't have enough evidence to dismiss or remove a person from working with vulnerable groups. Making DBS referrals where the referral conditions are not met, will be done in consideration of relevant employment and data protection laws.

DBS are required by law to consider all information sent to us from any source. This includes information sent to us where the legal referral conditions are not met. DBS will use legal powers and barring processes to determine whether the person should be barred from working in regulated activity with children and / or vulnerable adults.

Harm, in this case, is not defined in legislation. DBS view harm as its common understanding, or the definition you may find in a dictionary.

Harm is considered in its widest context and may include (This is not a fully comprehensive list; harm can take many different forms):

- sexual harm
- physical harm
- financial harm
- neglect
- emotional harm
- psychological harm
- verbal harm

As an employer of practitioners and volunteers in a regulated activity, Big Creative Academy must make a referral when both of the following conditions have been met:

Condition 1

Permission is withdrawn for a person to engage in regulated activity with children and/or vulnerable adults, including moving the person to another area of work that isn't regulated activity. This includes situations when you would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.

Condition 2

You think the person has carried out one (1) of the following:
engaged in relevant conduct in relation to children and/or adults. An action or inaction has harmed a child or vulnerable adult or put them at risk or harm, or; satisfied the harm test in relation to



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children and / or vulnerable adults. e.g., there has been no relevant conduct but a risk of harm to a child or vulnerable still exists, or; been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence when employing agency staff, both Big Creative Academy and agency have a responsibility to refer as above.

Relevant conduct in relation to a child (a person under 18 years of age) includes:

- endangers a child or is likely to endanger a child
- if repeated against or in relation to a child would endanger the child or be likely to endanger the child
- involves sexual material relating to children (including possession of such material)
- involves sexually explicit images depicting violence against human beings (including possession of such images)
- is of a sexual nature involving a child

A person's conduct endangers a child if they:

- harm a child
- cause a child to be harmed
- put a child at risk of harm
- attempt to harm a child
- incite another to harm a child

The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education 2025.



26 - APPENDIX E

Useful Contacts in Waltham Forest

<p>Multi-Agency Safeguarding Hub (MASH)</p> <p>Single point of referral for Early Help, Child Protection and Adults' Safeguarding in Waltham Forest</p>	<p>Phone: 020 8496 2310 Mon-Thurs, 9am-5.15pm and Fri, 9am-5pm Out of Hours: 020 8496 3000 Email: MASHrequests@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours</p>
<p>LADO Team</p> <p>Allegations against staff and volunteers (ASV)</p>	<p>Phone: 020 8496 3646 Email: LADO@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a same-day phone response during normal business hours</p>
<p>Safeguarding in Education Team Consultations / Training / Support (traded service)</p>	<p>Phone: 020 8496 3646 Email: safeguardingineducation@walthamforest.gov.uk</p> <p>N.B.: If you cannot get through by phone, send an email with your contact details, and you will get a phone response within 24 hours during normal business hours</p>
<p>Early Help</p>	<p>Phone: 020 8496 1517 Email: earlyhelp@walthamforest.gov.uk</p>
<p>Virtual School</p>	<p>Phone: 020 8496 1741 Email: virtual.school@walthamforest.gov.uk Head of Virtual School: fay.blyth@walthamforest.gov.uk</p>
<p>Special Educational Needs & Disability (SEND) Service [formerly known as Disability Enablement Service (DES)]</p>	<p>Phone: 020 8496 6503 Email: senteam@walthamforest.gov.uk</p>
<p>Local Safeguarding Children Partnership (LSCP)</p>	<p>Email: strategicpartnerships@walthamforest.gov.uk</p>



Local Safeguarding Partners (LSPs)	
Child Death Overview Panel (CDOP) notifications	Phone: 020 8496 3691 Email: CDOP@walthamforest.gov.uk
Female Genital Mutilation (FGM) Community Safety	Refer via MASH . Phone: 020 8496 3281 Email: sylvie.lovell@walthamforest.gov.uk
Prevent Community Safety	Refer via MASH . Phone: 020 8496 3000 Mob: 07816150037 Email: PREVENT@walthamforest.gov.uk
Gangs Community Safety	Refer via MASH . Email: communitysafety@walthamforest.gov.uk
Adolescent Safeguarding Lead Children's Social Care	Refer via MASH . Email: reanne.turner@walthamforest.gov.uk
Harmful Sexual Behaviour Lead Children's Social Care	Refer via MASH . Email: tracey.goddard@walthamforest.gov.uk Tel: 020 8496 5027 Mob: 0797 476 8433
MARAC / DRM queries	Refer via MASH . MASHrequests@walthamforest.gov.uk
Mental Health First Aid / Public Health	catherine.hutchinson@walthamforest.gov.uk
Private Fostering	Refer via MASH . Email: charlotte.andrews@walthamforest.gov.uk Phone: 020 8496 1235 Mob: 07730 766 429
Violence against women and girls (VAWG) & Domestic Abuse one-stop-shop	Refer via MASH . Email: vawg@walthamforest.gov.uk ; domesticabuseadvice@walthamforest.gov.uk