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BCT Safeguarding and Child Protection Policy (Part 1)

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SAFEGUARDING CONTACTS AT BIG CREATIVE TRAINING

The Designated Safeguarding Lead (DSL) is the first point of contact for all safeguarding concerns and child protection incidents:

Alexandra Marquez Designated Safeguarding Lead (DSL) Student Services Manager	07429 776 721 020 3873 5800 ext 5812 alexandra.marquez@bigcreative.education
Nia Sinclair Deputy Designated Safeguarding Lead LAC Lead	07378146982 020 3873 5800 ext 5808 Nia.sinclair@bigcreative.education
Aiyesha Simmonds Student Services & Safeguarding Officer	020 3873 5800 ext 5808 aiyesha.simmonds@bigcreative.education
Ben Jolly Deputy DSL & out of hours emergency contact	07834 182 380 ben.jolly@bigcreative.education

KEY CONTACTS WITHIN THE LOCAL AUTHORITY

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



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- o <https://thehub-beta.walthamforest.gov.uk/safeguarding-in-education>
- The Waltham Forest Local Safeguarding Partners (Waltham Forest Safeguarding Children Board) can provide advice and training.
 - o 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.
 - o <https://directory.walthamforest.gov.uk/kb5/walthamforest/directory/advice.page?id=5ILArmjPvHo>

REFERRAL TO LOCAL AUTHORITY SOCIAL SERVICES

- o 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.
- o 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:
 - o Tel: 020 8496 2310 (Monday to Thursday, 9am-5.15pm and Friday, 9am-5pm)
 - o Tel: 020 8496 3000 (Out of Hours).
- o 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.
- o If the young person does not reside in Waltham Forest contact their home borough social services.



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1. PURPOSE AND INTRODUCTION

This policy is in line with 'Keeping Children Safe in Education 2025' and 'Working Together to Safeguard Children 2023'.

"Because of their day-to-day contact with individual children, teachers and other staff are particularly well-placed to observe outward signs of abuse, changes in behaviour or failure to develop". (The Children Act 1989)

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 BCT's commitment to the development of good practice and sound procedures explicit. This ensures that safeguarding concerns, referrals and monitoring may be handled sensitively, professionally and in ways which support the needs of the learner.

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

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 and apprentices.

Protection by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to safeguarding concerns.

Support to learners and apprentices and staff who may be affected by safeguarding concerns or issues arising.

This policy applies to all learners and apprentices, staff, volunteers and visitors to BCT. BCT recognizes it is an agent of referral and not of investigation.

All staff must maintain an attitude of 'it could happen here'.

2. WHOLE COLLEGE APPROACH TO SAFEGUARDING

- 2.1. BCT proprietors will ensure they facilitate a whole school or college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- 2.2. Where there is a safeguarding concern, college leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- 2.3. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- 2.4. BCT leaders will ensure that the arrangements detailed in this policy regarding Safeguarding and Prevent are promoted to all staff in the following ways:



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- New staff will have Safeguarding and Prevent as key elements of their staff induction. New staff will complete training in both areas that includes certificated courses which must be passed in order to pass probation
- Existing staff will take part in an annual rolling programme of training which will ensure all staff are aware of the latest version of KCSIE and how to ensure the principles and practice are embedded in their everyday working lives
- We will undertake an annual safeguarding status check which will ensure that staff are made aware of any changes to the policy, and KCSIE, and will sign a declaration confirming this is the case

3. POLICY

We recognise that for our learners and apprentices, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps to prevent abuse. BCT will therefore:

- Establish and maintain an environment where learners and apprentices feel safe and secure and are encouraged to talk, and are listened to.
- Ensure that learners and apprentices know that there are adults within BCT who they can approach if they are worried or are in difficulty.
- Where possible include in the curriculum activities and opportunities for personal health and social education (PHSE), which equip learners and apprentices with the skills they need to stay safe from abuse.
- Where possible include in the curriculum material which will help learners and apprentices develop realistic attitudes to the responsibilities of adult life.
- Ensure that wherever appropriate every effort will be made to establish effective working relationships with parents and carers and colleagues from partner agencies.

4. FRAMEWORK

Safeguarding is the responsibility of all adults and especially those working with children. The development of appropriate procedures and the monitoring of good practice are the responsibilities of the Local Safeguarding Children Board (LSCB).

All action to safeguard Big Creative Training's learners is taken in line with the following guidance:

- Local Safeguarding Children Board (LSCB) guidelines
- London Child Protection Procedures 2018
- Keeping Children Safe in Education September 2025
- What to Do If You're Worried a Child Is Being Abused 2015
- Working Together to Safeguard Children 2023
- Sexual violence and sexual harassment between children in schools and colleges 2021

5. ROLES AND RESPONSIBILITIES

- 5.1. All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within BCT and the local authority who have specific responsibilities under safeguarding procedures. The names of those carrying out these responsibilities are listed on the cover sheet of this document.



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- 5.2. It is the role of the DSL to ensure that all the safeguarding procedures are followed within BCT, and to make appropriate, timely referrals to local authority social services in accordance with these procedures. If for any reason the DSL is unavailable, a deputy DSL has been identified who will act in their absence.
- 5.3. Additionally, it is the role of the DSL to ensure all staff members (including temporary staff and volunteers) are aware of BCT's procedures, and to advise staff and to offer support to those requiring this.

6. SENIOR MANAGEMENT TEAM'S ROLE IN SAFER RECRUITMENT

- 6.1. The BCT senior management team is responsible for ensuring that BCT follows safe processes. As part of the BCT's recruitment and vetting process, enhanced DBS checks will be sought on all staff and volunteers that have substantial and unsupervised access to learners and apprentices.
- 6.2. BCT will consider online searches as part of their due diligence checks on shortlisted candidates. The search will be taken as part of the due diligence and onboarding process. Searches will be undertaken via Google and social networking websites. Any identified concerns will be discussed with the employee.
- 6.3. No member of staff will be allowed unsupervised access to learners and apprentices until BCT has received the results of satisfactory references and DBS check. All new staff will complete a safeguarding self-disclosure form prior to starting work.
- 6.4. All BCT offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks. All Schools and colleges must:
 - verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available.
 - obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children).
 - verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
 - verify the person's right to work in the UK, including EU nationals.
 - if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate
 - verify professional qualifications, as appropriate
- 6.5. Where BCT allows an individual to start work in regulated activity relating to children before the DBS certificate is available, they will ensure that the individual is appropriately supervised and that they carry out all other checks, including a separate children's barred list check.
- 6.6. Separate barred list checks must only be carried out in the following circumstances:
 - for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 have been carried out); or,
 - where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than



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three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph have been carried out).

7. IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM

- 7.1. Teachers and other adults in school are well placed to observe any physical, emotional or behavioural signs, which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and carers and the public which foster respect, confidence and trust can lead to disclosures of abuse, and/or school staff being alerted to concerns.
- 7.2. As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday.
- 7.3. Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioral development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.
- 7.4. 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.
- 7.5. Abuse and Neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or 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. They may be abused by an adult or adults or by another child or children.

8. RECOGNISING ABUSE

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and 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. 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.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical



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harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

9. CONTEXTUAL SAFEGUARDING

All staff should be aware that safeguarding incidents and/or behaviours can 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, sexual abuse, serious youth violence and county lines.



10. CHILD CRIMINAL EXPLOITATION: COUNTY LINES/ SERIOUS YOUTH VIOLENCE

10.1. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

10.2. "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 schools (mainstream and special), 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."

10.3. 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. knife 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.



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- Who is vulnerable to county lines exploitation/ serious youth violence?

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

- Children as young as 12 years old are 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').

10.5. BCT 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)

10.6. The DSL of BCT works closely with Waltham Forest Safer Schools Officer to help identify and support learners and apprentices who are at risk of serious youth violence. BCT carries search operations throughout the academic year with the support of Waltham Forest metropolitan police. BCT recognises that learners and apprentices may carry weapons for a variety of reasons and we are dedicated to supporting and educating our learners and apprentices 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 and carers 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.

10.7. BCT security team carry out random searches of learners and apprentices 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. If a staff member becomes aware that a learner is using more than one phone (usually an indicator of potential involvement in country lines), this should be reported to the DSL immediately so the DSL can notify the parent/carer of the learner to help safeguard the learner from exploitation or potential involvement in county lines.



11. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE TO ABUSE

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
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- learners and apprentices who are looked-after by the local authority or care-leavers
- learners and apprentices who have a social worker or supported by Early Help
- 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.

12. CHILD SEXUAL EXPLOITATION

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse including via the internet.

- 12.1. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine



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romantic relationship.

12.2. Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

12.3. Children who have been exploited will need additional support to help maintain them in education. CSE 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.

12.4. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

12.5. BCT includes the risks of sexual coercion and exploitation in the SDP curriculum, which is taught across our study program and aims to educate learners and apprentices on the risks and warning signs of CSE. A common feature of sexual exploitation is that the child often doesn't recognize 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.

12.6. All staff are made aware of the indicators of sexual exploitation through safeguarding induction and training opportunities and all concerns are reported immediately to the DSL via CPOMS. The DSL will work with learners and apprentices and their parent/carer to provide timely and appropriate support for victims of CSE. Referrals to local authority CSC and/or police will also be considered, if appropriate.

13. CHILDREN POTENTIALLY AT GREATER RISK OF HARM / CHILDREN WITH A SOCIAL WORKER

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.

13.1. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and



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colleges to safeguard and promote the welfare of children.

- 13.2. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

14. SAFEGUARDING LEARNERS AND APPRENTICES WITH SPECIAL EDUCATIONAL NEEDS

BCT recognizes that learners and apprentices 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. BCT understands that there is a higher risk of peer group isolation, bullying and difficulties with communication for learners and apprentices who have educational needs. BCT DSL, SEN Manager and Student Services department liaise and work together to minimise the potential of abuse and recognize any signs of abuse or change in behavior. Learners and apprentices with special educational needs have a higher risk of being isolated by their peers and may be disproportionately affected by bullying.

To provide pastoral support for these learners and apprentices, 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.

15. HONOUR-BASED ABUSE

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

- 15.1. If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach.

16. FEMALE GENITAL MUTILATION (FGM)

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.



- 16.1. 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. 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.
- 16.2. 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.
- 16.3. There are 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 a 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 behavior 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 child 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.

- 16.4. 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.
- 16.5. 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. When mandatory reporting commences in October 2015 (see below) these procedures will remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.
- 16.6. 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.

16.7. 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.

16.8. Reporting FGM cases is mandatory. Schools 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 learners and apprentices 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 page 83)
- Multi-agency practice guidelines: FGM, Home Office, DfE (see pages 8, 16, 17 and 42)
- <http://www.londonscb.gov.uk/fgm/>
- National FGM Helpline- 0800 028 3550

17. BCIS / ALTERNATIVE PROVISION

17.1. Definition: *“Education arranged by local authorities for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education; education arranged by schools for pupils on a fixed period exclusion; and pupils being directed by schools to off-site provision to improve their behaviour.” (Taken from Alternative Provision 2013)*

17.2. Big Creative Training provides alternative provision for 14-16 year olds on site under the organisation 'BCIS' (Big Creative Independent School). BCT will ensure that all 14-16 year olds are appropriately safeguarded whilst studying on-site and will have their wellbeing needs met appropriately. Alternative Provision learners are supplied with an orange coloured lanyard so they can be easily identified when in the building with 16+ learners and apprentices. Learners in Alternative Provision will be under staff supervision at all times and staff members will liaise with parent/carer/ school and local authority in regards to any attendance or behavioural issues. Alternative Provision

¹“teacher” means—

(a) in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England);



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learners will not share classes with 19+ learners and apprentices. For further information and policies regarding our Alternative Provision program please visit: <http://www.bcepolicies.com/bcis-policies/>

18. ELECTIVE HOME EDUCATION

- 18.1. Waltham Forest's guidance on Elective Education is currently under review and may be subject to change. BCIS & BCT will refer to the existing guidance available on Elective Home Education: [WF Elective Home Education Guidance and Protocols](#)

19. CHILD ON CHILD ABUSE

Big Creative Training recognises that children can abuse other children (often referred to as peer on peer 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).

- 19.1. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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 peers;
- 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 nudes and semi nudes 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).



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- 19.2. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- 19.3. Big Creative Training is committed to providing a safe environment in which learners and apprentices feel safe. Learners and apprentices are expected to behave in a way that is considered respectful of others and inclusive of all individuals. Before enrolment, prospective learners and apprentices are given the opportunity to state whether they have a criminal conviction. Learners and apprentices who are identified as high risk will be referred to our Metropolitan Police Safer Schools Officer who can run a background check on learners with details of all previous convictions. A risk assessment will be completed and discussed with SMT/DSL as to whether BCT can accept the learner who could potentially pose a threat to other young people and staff in the building.
- 19.4. BCT 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. BCT understands that child on child abuse must never be tolerated as 'banter' and will be investigated with utmost importance.
- 19.5. BCT 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 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.
- 19.6. BCT will investigate allegations in line with our disciplinary procedure. BCT recognises that criminal allegations will be reported to the police but must not wait for the outcome of police investigation as this could be detrimental to the young person receiving education on-site.

20. CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT

Context: Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of 'it could happen here'. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

- 20.1. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Schools and colleges should



be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college, including intimate personal relationships.

- 20.2. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- 20.3. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult learners and apprentices and school and college staff are supported and protected as appropriate.
- 20.4. 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

21. HARMFUL SEXUAL BEHAVIOUR

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

Context: 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. HSB should be considered in a child protection context.

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.

- 21.1. Responding to Harmful Sexual Behaviour:
- Big Creative Training 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 learners and apprentices (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 and carers will be contacted to inform them of our 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 and apprentices are kept safe whilst on-site.

- Big Creative Training will consider the makeup of their own student body, including the sex and age range of its learners and apprentices and whether additional support for children with protected characteristics (who are potentially at greater risk) is appropriate. The evidence shows that girls are more likely to be subject to sexual violence and sexual harassment than boys, and that boys are more likely to perpetrate such violence and harassment.

21.2. Upskirting: "The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's 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 sex, can be a victim".

- From 12th April 2019 a new law came into force across England and Wales and offenders can now be arrested and sent to prison. The Voyeurism Act outlaws 'Upskirting' where the purpose is to obtain sexual gratification, or to cause humiliation, distress or alarm. This includes instances where culprits say images were just taken 'for a laugh' or when paparazzi are caught taking intrusive images.
- BCT will respond to any allegations of 'upskirting' by speaking with all parties involved and obtaining advice/reporting this offence to our Safer Schools Officer (or 101) on how to proceed. Police and prosecutors have now updated their guidance to ensure the law is properly enforced – with offenders facing up to 2 years in jail and being placed on the sex offenders register.

21.3. 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.

21.4. 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)
- The DSL will consider whether there is an element of harmful sexual behaviour involved along with whether special educational needs are present
- Parents and carers should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents and carers 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.

21.5. 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 BCT Designated Safeguarding Lead who will meet with the victim and accused learner to understand the nature of the incident. BCT will carefully 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. 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 that BCT 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. BCT will strongly consider the following:

- 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 difficulty?;
- 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 learners and apprentices or school or college staff?; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

21.7. The starting point regarding any report is a zero tolerance approach to sexual violence and sexual harassment and it 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 behaviours and an unsafe environment for children.



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21.8. Risk Assessment:

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should 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 learners and apprentices 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 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 learners and apprentices 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 college's approach to supporting and protecting their pupils and learners and apprentices and updating their own risk assessment.

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

22. CHILDREN MISSING FROM EDUCATION

- 22.1. All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.
- 22.2. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.
- 22.3. Effective information sharing between parents and carers, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes.
- 22.4. All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include 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, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying



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safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

22.5. There are many circumstances where a child may become missing from education so it is vital that local authorities make judgements on a case by case basis. Although not exhaustive, the list below presents some of the circumstances that local authorities should consider when establishing their CME policies and procedures. Children may be missing from education:

- because they are suffering from abuse or neglect. Where this is suspected schools should follow local child protection procedures. However, if a child is in immediate danger or at risk of harm, a referral should be made immediately to children's social care (and the police if appropriate). Local authority officers responsible for CME should check that a referral has been made and, if not, they should alert children's social care. The Department's statutory guidance Keeping children safe in education provides further advice for schools and colleges on safeguarding children.
- Children of Gypsy, Roma and Traveller (GRT) families – Research has shown that many children from these families can become disengaged from education, particularly during the secondary school phase
- Children of Service Personnel – Families of members of the Armed Forces are likely to move frequently – both in the UK and overseas and often at short notice.
- Missing children and runaways – Children who go missing or run away from home or care may be in serious danger and are vulnerable to crime, sexual exploitation or abduction as well as missing education.
- Children and young people supervised by the Youth Justice System – Children who have offended or are at risk of doing so are also at risk of disengaging from education. Local authority Youth Offending Teams (YOTs) are responsible for supervising those young people (aged 8 to 18).
- Children who cease to attend a school – there are many reasons why a child stops attending a school. It could be because the parent chooses to home educate their child. However, where the reason for a child who has stopped attending a school is not known, the local authority should investigate the case and satisfy itself that the child is receiving a suitable education.
- Children of new migrant families – children of new migrant families may not have yet settled into a fixed address or may have arrived into a local authority area without the authority becoming aware, therefore increasing the risk of the child missing education.

23. CHILDREN WHO ARE ABSENT FROM EDUCATION

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after



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child), where being absent from education may increase known safeguarding risks within the family or in the community.

- 23.1. If a learner has not attended their first lesson, BCT support Tutors will attempt to contact the learner on their personal mobile number. If contact with a learner is not possible, BCT Tutors may contact either one of the two emergency contacts in order to find out the whereabouts of the learner. If the learner missing education is in care, staff members will liaise with foster carer/key worker/social worker to understand why the learner is absent and how BCT can support their return to education.

24. EMERGENCY CONTACTS

The Keeping Children Safe in Education 2025 government policy states that where reasonably possible, all schools and colleges must obtain more than one emergency contact for each learner. BCT requests at least two emergency contacts for all learners and apprentices including; name, relation to learner, mobile number, email address and address. This is to ensure that we are able to contact one of two key adults to the learner in the case of an emergency, child missing from education or in regards to welfare/safeguarding concerns.

25. PRIVATE FOSTERING ARRANGEMENTS

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 staff through the normal course of their interaction, and promotion of learning activities, with children.

- 25.1. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
- 25.2. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.
- 25.3. When a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the school should notify the local authority of the circumstances to allow the local authority to check if 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.

26. DOMESTIC ABUSE

Domestic abuse can [be] psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being,



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development, and ability to learn.

- 26.1. Domestic Abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers.
- 26.2. Witnessing domestic abuse is really distressing and scary for a child, and causes serious harm. Children living in a home where domestic abuse is happening are at risk of other types of abuse too. Children can experience domestic abuse or violence in lots of different ways. They might:
- see the abuse
 - hear it from another room
 - see a parent's injuries or distress afterwards
 - be hurt by being nearby or trying to stop the abuse.
- 26.3. Domestic abuse can happen in any relationship, and it affects young people too. They may not realise that what's happening is abuse. Even if they do, they might not tell anyone about it because they're scared of what will happen, or ashamed about what people will think.
- 26.4. BCT has a partnership with Operation Encompass, which operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

27. PREVENT AND ANTI-RADICALISATION

- 27.1. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.
- 27.2. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be part of BCT's safeguarding approach.
- 27.3. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
Radicalisation refers to the process by which a person comes to support terrorism and



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extremist ideologies associated with terrorist groups.

- 27.4. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 27.5. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.
- 27.6. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.
- 27.7. At BCT 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) and '*Keeping Children Safe in Education*' (2025). An integral part of that work relates to the government's Prevent strategy and the duties it places on academic institutions.
- 27.8. BCT is committed to providing a secure environment for pupils, where children feel safe and are kept safe. All adults in our school recognize 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. 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
 - 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 or culture



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- 27.9. By continually developing our leadership and accountability practices, staff training opportunities (primarily the Home Office developed WRAP Training), referral systems and management of those referrals, we strive to demonstrate a proactive and diligent approach to this aspect of our responsibilities as educators and safeguarding professionals.
- 27.10. 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 learners and apprentices - and the wider community - against the threats of extremism, through the promotion of both fundamental values and cohesion amongst our communities.
- 27.11. We also recognize that further information and support is available from the Multi-Agency Safeguarding Hub (020 8496 2310), the Local Authority's Community Safety Team (020 8496 3000) and the PREVENT Education Officer/Citizenship and Cohesion Advisor for WF amy.strode@walthamforest.gov.uk 0208 496 3447.

28. ONLINE SAFETY - INTERNET FILTERING AND MONITORING

- 28.1. Whilst learners and apprentices can access free WIFI on-site, internet usage is restricted and our IT systems automatically block individuals from accessing a site that is deemed inappropriate to be visiting whilst in a learning environment. BCT learners and apprentices may be required to access the internet in lessons under the instruction of their tutor for coursework and/or research purposes. BCT Tutors have introduced procedures to stop learners and apprentices from using their phones during lesson time eg.: phone box (all phones to be placed in a secure box before lesson, phones are returned at the end of lesson).
- 28.2. BCT's Senior Management Team works closely with the DSL and ICT manager in all aspects of filtering and monitoring. The DSL and ICT Manager lead on safeguarding and online safety, which include overseeing and acting on:
- filtering and monitoring reports
 - safeguarding concerns
 - checks to filtering and monitoring systems
 - maintaining filtering and monitoring systems
 - providing filtering and monitoring reports
 - completing actions following concerns or checks to systems
- 28.3. BCT has implemented IT software 'Smoothwall' on WIFI networks. Learners and apprentices and visitors will be required to log into the WIFI network, this system will then block any inappropriate content and will notify IT Manager and the safeguarding team of any inappropriate sites that learners and apprentices have attempted to visit. This software is an added layer to help safeguard learners and apprentices from any inappropriate websites or content and gives us the ability to monitor internet usage and block sites for individual learners and apprentices as well as groups.
- 28.4. For further information, refer to BCT's Online Safety Policy and Acceptable Use Policy/Agreement.



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29. 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, is 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.

- 29.1. 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.
- 29.2. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken:
 - If a staff member becomes aware that a learner may be experiencing mental health concerns this should be reported to the DSL or Safeguarding Officer via CPOMS so further conversations with the young person to better understand their current concerns/difficulties can take place.
 - Referrals to BCT's internal counselling service may be appropriate for general mental health support; if a learner requires a more tailored approach/assessment, referrals to the young person's mental health team in borough will be considered (CAMHS, IAPT, GP referrals).
 - There are a number of staff members at BCT who have been fully trained to deliver Mental Health First Aid (MHFA). Mental Health First Aid is a training program that teaches members of the public how to help a person developing a mental health problem (including a substance use problem), experiencing a worsening of an existing mental health problem or in a mental health crisis. Like traditional first aid, Mental Health First Aid does not teach people to treat or diagnose mental health or substance use conditions. Instead, the training teaches people how to offer initial support until appropriate professional help is received or until the crisis resolves.

30. SAFEGUARDING AND CHILD PROTECTION PROCEDURES

All action is taken in line with the following guidance;

- Local Safeguarding Children Board (LSCB) guidelines
 - London child protection procedures 2018
 - Keeping Children Safe in Education September 2025
 - What to Do If You're Worried a Child Is Being Abused 2015
 - Working Together to Safeguard Children July 2023
 - Sexual violence and sexual harassment between children in schools and colleges 2021
- 30.2. BCT 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 company who rarely work unsupervised, more usually working alongside members of staff. However, the DSL will ensure they are aware of and work within BCT's policy.



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- 30.3. Any member of staff, volunteer or visitor to BCT who receives a disclosure or allegation of abuse, or suspects that a learner may have suffered significant harm or be at risk of suffering significant harm, or who notices possible signs or indicators of abuse must make an immediate report to the DSL or the deputy designated DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff available as a matter of priority.
- 30.4. In the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, this should be reported directly to the designated officer(s) at the local authority (Waltham Forest LADO).
- 30.5. The DSL will immediately refer cases of suspected abuse or allegations of abuse to the local authority (Children's Social Care or the LADO as appropriate). The report will include the following:
- The learner's name, gender, address, date of birth, family composition, ethnicity, religion, any special needs
 - The reason for the referral, including details of any significant events in the learner's life
 - Details of any allegations made including verbatim reports of any relevant conversations
 - The learner's current location and emotional / physical condition
 - Identity of those with parental responsibility and details of whether they are aware of the referral
 - The name of person who initially received the disclosure plus any advice given
- 30.6. The young person concerned must be informed that this information is being passed on to the DSL who will deal with information in line with this policy. There may be exceptional cases where it is judged that the referral should be made without the consent of the young person and this is a matter of judgement for the DSL.
- 30.7. The DSL should follow up with local authority Children's Social Care within 24 hours of the referral to determine the outcome of the referral and any action to be taken. The DSL is responsible for establishing the outcome of the referral.
- 30.8. Staff are responsible to make direct referrals in the unlikely case of an emergency if they can't find the DSL or believe that their concern is minimised or not taken seriously.
- 30.9. BCT is committed to sharing referral information with learner's parents and carers unless to do so could place the learner at greater risk of harm or impede a criminal investigation. On these occasions advice will be taken from the local authority or the police.
- 30.10. 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 on CPOMS.
- 30.11. Where concerns do not relate to the immediate risk of significant harm the DSL will discuss the concerns with relevant colleagues and agree a plan of action which will be recorded by the DSL on CPOMS.



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- 30.12. 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.

31. TRAINING AND SUPPORT

- 31.1. All staff will undertake appropriate safeguarding awareness training to equip them to carry out their responsibilities for safeguarding effectively, and training will take place at least annually to ensure that staff are up to date with current learning.
- 31.2. BCT will ensure that the DSL undertakes a DSL refresher training every two years with annual training to ensure that their knowledge and skills are up to date. This may include specific issues training, multi-agency training delivered by the LSCB or attendance at the safeguarding forums held by the Senior Safeguarding Lead for LB WF.
- 31.3. Temporary staff and volunteers who work with learners and apprentices at BCT will, through induction training, be made aware of the company's arrangements for safeguarding and their responsibilities.
- 31.4. Support is available for staff from the DSL where there are concerns or queries about safeguarding.
- 31.5. All staff are offered guidance on the boundaries of appropriate behaviour and conduct. These matters form part of staff induction and this guidance is available in the staff handbook. All staff and volunteers sign the BCT code of conduct to which they are expected to adhere at all times.
- 31.6. All staff have access to guidance on how to spot indicators of potential abuse through training and regular updates from the DSL.
- 31.7. All staff have access to a free counselling service through the HR department.

32. 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.

- 32.1. 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 DSL and may require further investigation by appropriate authorities.
- 32.2. Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a "need to know basis". Any information shared with a member of staff in this way must be held confidentially by them.
- 32.3. Where sharing will be in the best interests of the relevant learner information will be shared with other organisations.



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33. RECORDS AND MONITORING

Well-kept records are essential to good safeguarding practice. BCT 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.
- All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Information will be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

33.2. Records should include:

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

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy)

33.3. Any member of staff receiving a disclosure of abuse or noticing signs or indicators of abuse must report via CPOMS, and alert the DSL or safeguarding officer based on their campus. All records will be dated and will include the action taken. These notes are kept on CPOMS, a secure and confidential safeguarding software.

33.4. If a learner transfers from BCT, these files will be copied and forwarded to the learner's new establishment marked confidential and for the attention of the DSL.

34. ATTENDANCE AT SAFEGUARDING CONFERENCES AND CORE GROUPS

34.1. It is the responsibility of the DSL to ensure that BCT is represented or a report is submitted to any safeguarding conference called for learners and apprentices on programmes at BCT or previously known to them. Whoever attends should be fully briefed on any issues or concerns BCT has and be prepared to make decisions on registration at the end of the conference.

34.2. When a learner is the subject of a child protection plan, it is the DSL's responsibility to ensure that the learner is monitored regarding their attendance, welfare and presentation.

34.3. If BCT is part of the core group, then the DSL should ensure that BCT is represented at these meetings; that there is a record of attendance and issues discussed on CPOMS.

34.4. All concerns about the CP plan and /or the learner's welfare should be discussed and recorded at the core group meeting unless the learner is at further risk of significant harm before the meeting date. In this case the DSL must inform the learner's social worker immediately and then record that they have done so and the actions agreed.

35. APPRENTICES



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BCT will take all necessary steps to support and protect its apprentices, both while at work and during their off the job training. Apprentices will receive training and support regarding safeguarding and Prevent as detailed in this policy.

- In addition, BCT will run sessions with each cohort on the importance of Prevent. This is also embedded into the wider skills programme - each apprentice completes a series of modules based on Prevent.
- Prevent and wider issues arising are discussed during apprentice reviews, and this is documented throughout ILPS

35.2. All apprentices are assigned a work coach employed by BCT who meets regularly with the apprentice to support them. The work coach is responsible for ensuring the apprentice is aware of the safeguarding and Prevent arrangements in place, and what to do if they have any concerns.

35.3. Apprentices are issued an induction pack at the start of their programme, this outlines details for student services and safeguarding team. The work coach will also reiterate this information during their initial assessment meetings.

35.4. BCT will assess if the apprentice has additional needs through their enrolment and induction process. If this is the case, we will refer to the SENDco.

35.5. If an apprentice raises concerns about the workplace or a colleague, we would stop them attending the workplace until an investigation has been carried out by the relevant staff and DSL.

35.6. Concerns about an apprentice are referred to, and managed by, the DSL in exactly the same way as any other learner at BCT

35.7. Apprentices who are required to work from home (WFH) will be made aware of the policy regarding WFH and supported in the same way as if they were at work in person. Employers must complete the WFH risk assessment template supplied to them by BCT.

35.8. Apprentices and employers must follow the detailed guidance around safeguarding and Prevent available in the relevant policies and procedures issued to them as part of the enrolment and induction processes. This will be monitored, checked and recorded by BCT

36. WORK PLACEMENTS

36.1. All work placements for learners and apprentices will be risk assessed according to our current policies.

36.2. H&S remains the responsibility of the placement provider however we will conduct and record appropriate due diligence checks.

36.3. All placements will provide a H&S induction to the learners or apprentices using the BCT template.



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- 36.4. Where under 18s are lone working with the placement provider BCT will conduct an enhanced DBS check on that individual.
- 36.5. BCT will provide guidance to placement providers as to appropriate action they should take if a learner discloses any concerns to them.
- 36.6. BCT will provide guidance to learners and apprentices who are on work placement as to action they should take if they have any concerns about their placement.

37. RISK ASSESSMENT OF TRIPS AND VISITS

In order to safeguard learners and apprentices, all activities that take place outside of BCT designated training centres must be prepared for and risk assessed in accordance with the policies and procedures in the staff handbook.

Failure by staff to adequately prepare for and risk assess any trips or visits may lead to disciplinary action under the disciplinary procedure.

38. USE OF COLLEGE PREMISES FOR NON-COLLEGE ACTIVITIES

- 38.1. Where BCT proprietors hire or rent 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) they should ensure that appropriate arrangements are in place to keep children safe.
- 38.2. When the proprietor, under the direct supervision or management of their college staff, provides services or activities their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.
- 38.3. The proprietor should also 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.

39. SUPPORTING LEARNERS AND APPRENTICES AT RISK

BCT recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth or view the world as a positive place. BCT may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, whilst at BCT their behaviour may still be challenging and defiant or they may not actively participate.

- 39.1. BCT will endeavour to support pupils through:
 - The curriculum to encourage good self-esteem and self-motivation.



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- The organisational ethos which promotes a positive, supportive and secure environment and which gives all learners and apprentices and adults a sense of being respected and valued.
- The implementation of BCT's behaviour management policies.
- A consistent approach agreed by all staff which will endeavour to ensure the learner knows that some behaviour is unacceptable but they are valued.
- Regular liaison with other professionals and agencies that support learners and apprentices and their families.
- A commitment to develop productive, supportive relationships with parents and carers, whenever it is in the learner's best interest to do so.
- The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations.
- Recognition that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse, so staff who work in any capacity with learners and apprentices with profound and multiple disabilities, sensory impairment and / or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.
- Recognition that in a home environment where there is domestic violence, drug or alcohol abuse, learners and apprentices may also be vulnerable and in need of support or protection.

40. TEACHING CHILDREN HOW TO STAY SAFE

40.1. Health and Safety Induction:

During induction, learners and apprentices are taken through BCT policies and procedures whilst studying on-site at our campus. Health and Safety induction ensures that learners and apprentices are aware of fire escapes, who the designated member of staff is for Health & Safety, who the designated first aiders are and where to find them, how to raise the fire alarm, who to report hazards to, fire assembly points and who to contact in case of emergency. Learners and apprentices complete and sign the Health and Safety questionnaire and provide back to the Facilities Manager to sign off.

40.2. IT Induction/ Acceptable Use:

IT Induction and Acceptable Use Policy is intended to ensure that learners and apprentices will be responsible users and stay safe whilst using the internet and other communications technologies for educational, personal and recreational use. IT induction covers social networking, safe surfing, cyber bullying and mobile phone safety.

40.3. Student Services and Safeguarding Induction:

Student Services Manager introduces the service and team to all learners and apprentices 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. Learners and apprentices 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 learners and apprentices during assembly and is based in the Student Services Hub to allow easy access for emotional support or disclosures.

40.4. Delivery of SDP sessions:

BCT delivers SDP (Self Development Program) lessons to all learners and apprentices on our study program and Alternative Provision. SDP lessons cover a wide range of



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topics such as: healthy relationships, sexual health, substance misuse, bullying, democracy, stress management, employability and Prevent. Delivering SDP sessions to learners and apprentices allows class discussion of important issues facing young people and provides an awareness of these topics, helping our learners and apprentices to keep themselves safe whilst working towards employability/ further education.

- 40.5. Safer schools' officer: BCT works closely with Metropolitan Police Safer Schools' Officer who may have a presence on campus and is available for learners and apprentices and staff to speak with in regards to any concerns. This partnership and presence of SSO increases levels of safety for staff and learners and apprentices on site and provides a direct bridge to Metropolitan Police services.
- 40.6. Appropriate Adults for students under 18 years old:
BCT recognise the importance of having an Appropriate Adult present in the event of the Police undertaking enquiries on our learners, and as such, will not allow any interviews of minors without the presence of their Parents/Guardian in the first instance, or without the presence of the DSL or a member of the safeguarding team, with parental consent. Without this they must not conduct an interview and our safer schools officer should be reminded of this if they attempt to interview an under 18.
- 40.7. Prevent and anti-radicalisation training:
London Borough of Waltham Forest Prevent Officer attends SDP sessions to meet with learners and apprentices and brief them around anti-radicalisation and resilience.

41. USE OF REASONABLE FORCE

- 41.1. Keeping Children Safe in Education 2023 states that there are circumstances when it is appropriate for staff to use reasonable force to safeguard learners and apprentices. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding a student to safety by the arm, standing between learners and apprentices or blocking a student's path to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent a student from:
- Committing an offence
 - Causing personal injury to any person (including themselves) or damage to property
 - Prejudicing the maintenance of good order and discipline at the college
- 41.2. The term 'reasonable' in these circumstances means 'using no more force than is needed. Big Creative Training recognises that reasonable force should be considered especially carefully when dealing with learners and apprentices with SEN, disabilities or medical conditions. These groups are particularly vulnerable and staff should refer to individual learning plans as necessary. This includes occasions when a student is not on college premises, e.g. on college visits and trips.

42. ALLEGATIONS/CONCERNS AGAINST STAFF (INCLUDING SUPPLY STAFF AND VOLUNTEERS)

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings



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and misinterpretations of events do happen.

- 42.1. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation.
- 42.2. 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. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. In the event of suspension, the school will provide support and a named contact for the member of staff.
- 42.3. Staff, parents and carers 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.
- 42.4. Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the LADO/police.
- 42.5. BCT acknowledges that there are two levels of allegation/concern:
 - Allegations that may meet the harm threshold.
 - Allegation/concerns that do not meet the harms threshold – otherwise referred to as 'low-level concerns'.
- 42.6. Allegations that may meet the harms threshold:

Big Creative Training will work in line with the guidance around allegations against staff/supply staff/volunteers as stated in Keeping Children Safe in Education 2023. BCT Senior Management team will review cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. 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, BCT will seek advice from the Waltham Forest local authority designated officer (LADO).

- 42.7. 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;
- 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.

42.8. Concerns that do not meet the harm threshold/Low Level Concerns

As part of the whole school approach to safeguarding, BCT will ensure that we promote 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.

- The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above.
- 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.

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

42.10. It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with BCT's HR manager, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

42.11. Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the HR manager via a phone call as soon as possible. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Big Creative Training aim to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which



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could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

42.12. Recording low-level concerns

- All low-level concerns should 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. Big Creative training will ensure records or low-level concerns are kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 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, BCT Senior Management Team 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 will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Keeping Children Safe in Education 2023 advise that schools and colleges can decide how long records of low-level concerns will be kept, however, it is recommended that it is retained at least until the individual leaves their employment.

42.13. Responding to low-level concerns

- In the event of a low-level concern disclosure regarding a member of staff, supply staff, visitor or sub-contractor, our HR manager 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 needs to be recorded along with the rationale for their decisions and action taken.

42.14. Where an allegation is made against any person working in or on behalf of the school that he or she 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; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This includes allegations against staff in their personal lives.

42.15. Whilst we acknowledge such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all



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allegations are investigated properly, in line with agreed procedures and outcomes recorded.

42.16. Initial Response to an allegation or concern:

- Treat the matter seriously and keep an open mind
- 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 most senior person in the organisation

42.17. Initial Action by the DSL.

If the DSL is the subject of the allegation, then the senior management team will take the following action. BCT reserves the right to contact the LADO (Local Authority Designated Officer) for advice and steps on how to proceed if any other staff member is the subject of an allegation.

- Obtain written details of the concern or allegation, but do not investigate or interview child, adult or witnesses
- Contact the LADO within 1 working day
- Discuss with the LADO next steps using the London Child Protection Procedures Flow Charts Allegations/Concerns Against Staff
- Inform the management team of the allegation
- Staff member in question must be informed if the allegation has been reported to the LADO and the likely course of action to follow unless instructed not to be the police/ children's social care.

42.18. Subsequent Action by the DSL/ Director of Operations (Deputy DSL)

- Conduct a disciplinary investigation, if an allegation indicates the need for this.
- Contribute to the child protection process by attending professional strategy meetings.
- Maintain contact with the LADO.
- Ensure clear and comprehensive records regarding the allegation, and action taken and outcome are retained on the staff member's personnel file.
- Duty to refer to DBS if a staff member has been dismissed or removed due to safeguarding concerns (as well as if the staff member has chosen to resign instead of dismissed).

LBWF LADO contact details:

LADO Manager: Caroline Coyston Assistant
Team Manager: Suzanna Bennett Telephone:
0208 496 3646
Email: LADO@walthamforest.gov.uk

43. ALLEGATIONS AGAINST FOSTER CARER IF A CHILD IS LOOKED AFTER

If a student who is looked after by their local authority discloses a safeguarding or child protection concern relating to their carer this will immediately be reported to:

- The local authority LADO
- The supervising Social Worker
- The student's Social Worker
- Local Authority MASH team



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44. WHISTLE BLOWING

We recognize that children cannot be expected to raise concerns in an environment where staff members do not do so. Therefore, all staff should be aware of their duty to raise concerns about the attitude or actions of colleagues in accordance with the BCT whistle blowing policy.

45. COMPLAINTS

Complaints by young people can be made under the complaints procedure in the learner handbook.

Complaints by staff can be made under the complaints procedure in the staff handbook.

46. POLICY REVIEW

The DSL is responsible for ensuring the annual review of this policy. Previous versions of the policy are to be kept to demonstrate progress and developments made. The DSL is responsible for ensuring that the list of key contacts on the cover sheet is kept up to date.

47. OUT OF HOURS SAFEGUARDING CONTACT

For safeguarding issues out of hours or during BCT holiday activities, immediately call Deputy DSL Ben Jolly on: 07834 182 380. If you believe a child or young person is at immediate risk of danger, call 999.

Date Updated	To Review	Responsibility
July 2025	Jul 2027	AMQ