



Safeguarding & Child Protection Policy

Updated By	Alex Wilson	Date	August 2025	Review Due	August 2026
-------------------	-------------	-------------	-------------	-------------------	-------------

Policy Statement

Bright Outcomes is committed to safeguarding and promoting the welfare of all children and young people. We recognise our moral and statutory responsibility to protect children from harm and ensure that they are safe, supported, and respected in every aspect of their engagement with us.

This policy applies to all staff and volunteers and should be read in conjunction with relevant statutory guidance including *Keeping Children Safe in Education (KCSIE) 2025* and *Working Together to Safeguard Children (2018)*

Logging a concern about a child's safety and welfare



Bright Outcomes: Concern about a staff member who does not work for Bright Outcomes



Bright Outcomes: Concern about a staff member who does not work for Bright Outcomes



Contents

Safeguarding Legislation and Guidance	3
Further Reading:.....	3
Roles & Responsibilities	4
The Founder:	4
Designated Safeguarding Leads (DSLs)	4
All staff and volunteers:	5
Definitions	6
Concerns about a child	6
Identifying Vulnerabilities	6
Recognising Abuse.....	7
Indicators of abuse	9
Understanding and recognising risk	10
Types of Harm	11
Child on Child Abuse	11
Bullying.....	12
Child-on-child sexual violence and sexual harassment	13
Youth-Produced Sexual Imagery (Sexting)	17
Serious Violence	17
Contextual safeguarding	17
Child sexual exploitation and child criminal exploitation	18
So-called 'honour based' abuse.....	21
Radicalisation and Extremism	24
Looked After Children or Previously Looked After Children	25
Children with a Social Worker	25
Private Fostering Arrangements.....	25
Domestic Abuse.....	26
Homelessness	27
Online Safety.....	28
Children who are Missing	29

Children who are lesbian, gay, bi, or trans (LGBT)	29
Taking Action	30
Welfare Concern	30
Disclosure.....	30
Notifying parents	32
Making a referral to Children's Services ..	32
Process on receipt of a concern	33
Locality Procedures	34
Staff reporting directly to child protection agencies.....	35
What will Children's Services do?	35
Early Support (formerly Early Help)	36
Record Keeping.....	36
Confidentiality.....	37
Support for those involved in a Child Protection Case.....	37
Staff & Volunteers	38
Conduct.....	38
Communication between staff and pupils	38
Post Employment	39
Safer Recruitment	39
Training.....	39
Managing Allegations Against Staff	40
Low level concerns.....	42
Whistleblowing	43
Policy Review	44
Data, Confidentiality & Information.....	44
Information Sharing	45
Photography & Images.....	45
Data Storage	46
Transfer of Records.....	46
Appendices	47
Appendix A: Roles & Responsibilities	47
Appendix B: Safer recruitment	49

Safeguarding Legislation and Guidance

Alternative Providers of Education - Section 157 of the Education Act 2011 and the Education (Independent Schools Standards) (England) Regulations 2014 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are engaged with Bright Outcomes.

The Teachers' Standards 2021 state that teachers, including Head Teachers, must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions; and maintain public trust in the teaching profession as part of their professional duties.

The statutory guidance, **Working Together to Safeguard Children (DFE, 2018)**, covers the legislative requirements and expectations on individual services (including Bright Outcomes) to safeguard and promote the welfare of children. It also provides the framework for Local Safeguarding Children Boards (LSCBs) to monitor the effectiveness of local services, including safeguarding arrangements at Bright Outcomes.

The statutory guidance, **Keeping Children Safe in Education (DfE 2025)**, is issued under Section 175 of the Education Act 2002, the Education (Independent Schools Standards) Regulations 2014. Bright Outcomes must regard to this guidance when carrying out their duties to safeguard and promote the welfare of children.

All staff must read Part One of **Keeping Children Safe in Education 2025**. Staff can find a copy on the shared Bright Outcomes Google Drive and in the Bright Outcomes office.

In addition, all staff who work directly with children should read **Annex B** (Bright Outcomes Senior Management Team will make a judgement about which staff this applies to) – as a minimum, it is recommended that it includes all school leaders, all staff working directly with children and young people, and all staff with defined pastoral responsibility.

What to do if you're worried a child is being abused 2015 - Advice for practitioners is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action

Further Reading:

This policy should be read by all staff in conjunction with the following policies:

- KCSIE Part One
- KCSIE Annex B
- Staff Code of Conduct
- Bright Outcomes Working Policies
- Bright Outcomes Staff Handbook

Roles & Responsibilities

The Founder:

Ensures this policy is implemented effectively.

Provides time, training, support, and resources for Designated Safeguarding Leads (DSLs) to fulfil their roles effectively.

Supports the welfare and education of looked-after children, ensuring staff are equipped to keep them safe.

- Promotes a safe environment where staff can report concerns confidently, following whistleblowing procedures.
- Ensures pupils are educated about safeguarding, including online safety, through the curriculum.
- Refers allegations of harm or risk by staff/volunteers to the Local Authority Designated Officer (DO) within one working day.
- Refers individuals who pose a risk to children to the Disclosure and Barring Service (DBS) when advised.
- Appoints a senior leader as a case officer to handle staff/volunteer allegations and serve as a point of contact.

This is a summary of the founders' responsibilities, a more detailed document can be found in the appendices.

Designated Safeguarding Leads (DSLs)

- **Lead DSL:** Alex Wilson
- **Deputy DSLs:** Andi Hillman
- **Other Staff who are DSL Trained:** Sam Scorrach & Andrew Parkin

The DSLs are responsible for overseeing safeguarding practices, providing support to staff, ensuring appropriate referrals are made, and maintaining secure records. They;

- Are senior leaders with authority to lead on safeguarding and child protection and hold primary responsibility for safeguarding but may delegate tasks to trained deputies.
- Must complete updated safeguarding training every two years.
- Provide support, guidance, and promote a culture of listening to children.
- Aware of and responsive to the needs of vulnerable children (e.g., SEN, looked-after, young carers).
- Inform parents of safeguarding responsibilities and possible referrals.

- Manage referrals to external agencies and collaborate in interagency meetings and plans.
- Maintain detailed, secure records of concerns and ensure these are shared with commissioning settings where appropriate and transferred to new establishments as required.
- Ensure staff understand and acknowledge safeguarding policies and guidance. Track staff training attendance and make policies publicly accessible.
- Review and update policies annually in consultation with the Bright Outcomes community.

This is a summary of the Designated Safeguarding Lead's responsibilities; a more detailed document can be found in the appendices.

All staff and volunteers:

To meet and maintain our responsibilities towards pupils we identify standards of good practice and set out our expectations of staff in the Staff Behaviour Policy, which all members of staff and volunteers are required to read and sign before starting work at Bright Outcomes. In summary, our expectations include:

- Treating all young people with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving young people in decisions that affect them.
- Encouraging positive, respectful, and safe behaviour among young people.
- Being a good listener.
- Being alert to changes in the young person's behaviour and to signs of abuse and neglect and exploitation.
- Recognising that challenging behaviour may be an indicator of abuse.
- Asking the young person's permission before initiating physical contact, such as assisting with dressing, physical support during any exercise or physical activity, or administering first aid.
- Maintaining appropriate standards of conversation and interaction with the young person and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some young people lead to an increased risk of abuse.
- Applying the use of reasonable force and physical intervention only as a last resort, normally when de-escalation strategies have failed, and when there is a clear risk of serious harm to the pupil or others.

- Referring all concerns about a young person's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Services.
- Following Bright Outcomes rules regarding communication and relationships with the young person, including via social media.
- Referring all allegations against members of staff, volunteers or other adults that work with children and any concerns about breaches of the Staff Behaviour Policy directly to the Founder.
- Reading, understanding and adhering to Bright Outcomes' policy outlined in the 'Further Reading' section of this policy, as well as other guidance deemed necessary.

Definitions

- **Safeguarding:** Protection from maltreatment, ensuring safe and effective care.
- **Child protection:** Actions to protect children who are suffering or likely to suffer significant harm.
- **Staff:** All those working for Bright Outcomes, full-time, part time, temporary or permanent, in either a paid or voluntary capacity.
- **Children:** Anyone under 18
- **Parent:** Referring to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Concerns about a child

Due to their day-to-day contact with young people, staff at Bright Outcomes are uniquely placed to observe changes in children's behaviour and the outward signs of abuse, neglect, exploitation, and radicalisation. Children may also turn to a trusted adult at Bright Outcomes when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse, are approachable and trusted by pupils/students, listen actively to children, and understand the procedures for reporting their concerns. Bright Outcomes will act on identified concerns and provide early help to prevent concerns from escalating.

Identifying Vulnerabilities

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's personality, behaviour, disability, mental and physical health needs, and family circumstances.

Bright Outcomes staff are aware of factors that can increase vulnerability, including:

- Vulnerable due to having Special Education Needs or Disabilities (SEND).
- Young carers.
- Affected by parental substance misuse, domestic abuse and violence or parental mental health needs.
- Asylum seekers.
- Looked after by the Local Authority or otherwise living away from home.
- Vulnerable to being bullied or engaging in bullying behaviours.
- Living in temporary accommodation.
- Living 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 child sexual exploitation (CSE).
- 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.

Recognising Abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

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 adult men or women or by other children or young people. Staff are trained to understand and recognise indicators of all four categories of abuse as defined below.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse, and neglect.

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, 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 a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave 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.

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.

Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may.

- have bruises, bleeding, burns, fractures or other injuries.
- show signs of pain or discomfort.
- keep arms and legs covered, even in warm weather.
- be concerned about changing for PE or swimming.
- look uncared for.
- change their eating habits.
- have difficulty in making or sustaining friendships.
- appear fearful.
- be reckless with regard to their own or other's safety.
- self-harm.
- frequently miss school or arrive late.
- show signs of not wanting to go home.
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn.
- challenge authority.

- become disinterested in their schoolwork.
- be constantly tired or preoccupied.
- be wary of physical contact.
- be involved in, or particularly knowledgeable about drugs or alcohol.
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development; and/or
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report all their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk of abuse.

Understanding and recognising risk

Keeping Children Safe in Education 2025 requires governing bodies and proprietors to ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a 'broad and balanced curriculum.'

Bright Outcomes support children who have an education provider who has a responsibility to deliver personal, social, health and economic (PSHE) programme.

Where relevant Bright Outcomes will support children to think about risks, they may encounter, recognise when they are at risk and with the support of staff work out how to get help when they need it and how risks might be reduced or managed.

Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. Bright Outcomes continually promotes an ethos of respect for children and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

Types of Harm

Child on Child Abuse

Bright Outcomes believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other students in the school.

Children may be harmed by other children or young people. All staff recognise that children can abuse other children and are trained to understand and implement the school's policy and procedures regarding child-on-child abuse. All child-on-child abuse is unacceptable and will be taken seriously. It is most likely to include, but is not limited to:

- bullying (including online bullying 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 stand-alone or part of a broader pattern of abuse.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery).
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim.
- teenage relationship abuse – defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner.
- initiation/hazing - (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. For example, can be used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and

- prejudiced behaviour – a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Bullying

Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people. Although incidences of bullying are less likely to occur in in-home provision, staff should still be aware of its types and effects.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported as a welfare concern.

Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls. Different gender issues can be prevalent when dealing with peer-on-peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

Occasionally, allegations may be made against students by other children, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Members of staff to whom such allegations are made and/or who become concerned about a pupil's sexualised behaviour, including any known online sexualised behaviour, should record their concerns in the usual way via 'Bright Outcomes: Logging a Concern' form (<https://tinyurl.com/LogConcern>) as with any other safeguarding concern.

It is likely that for an allegation or concern to be addressed under child protection procedures, some of the following features will be found. The allegation or concern:

- is made against an older child and refers to their behaviour towards a younger pupil or a more vulnerable pupil.
 - is of a serious nature, possibly including a criminal offence.
 - raises risk factors for other pupils in the school.
 - indicates that other pupils may have been affected by this child.
 - indicates that young people outside the school may be affected by this student.
- It is important for Bright Outcomes to consider the wider environmental factors and context within which child-on-child abuse occurs (please also see

Contextual Safeguarding below). Such factors may include the potential for bullying and child-on-child abuse to take place across a number of social media platforms and services; and for things to move from platform to platform online. Bright Outcomes will also consider the potential for the impact of the incident to extend further than the Bright Outcomes local community (e.g., for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator(s)) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from The UK Safer Internet Centre at 0344 381 4772 and helpline@saferinternet.org.uk and the Internet Watch Foundation at <https://www.iwf.org.uk>

Child-on-child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender 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 KCSiE 2025, all staff working with children are advised to maintain an attitude of **'it could happen here'**.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. While it is important that all victims are taken seriously and offered appropriate support, staff are trained to be aware that 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.

All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If children report sexual violence and/or harassment by children at a different educational provision the DSL will liaise with the DSL at the alleged perpetrator(s) education provider as well as the victim's parents, the Police and Children's Services. Support for the victim will be provided as described below, irrespective of which educational provision the alleged perpetrator(s) attends.

What is sexual violence and sexual harassment?

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity.
- the age of consent is 16.
- sexual intercourse without consent is rape.

Sexual harassment in the context of child-on-child behaviour is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Bright Outcomes therefore recognises the importance of recognising the nature of identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children.

Responding to a Report

Bright Outcomes will respond to reports in accordance with Part 5 of Keeping Children Safe in Education 2025, and in conjunction with the education provider of the child.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the Bright Outcomes sessions should not be downplayed and should be treated equally seriously. 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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

If an offence has been committed, the Police will be informed. It is the prerogative of parents and victims to make complaints to the Police directly, but Bright Outcomes will also speak to the Police in order to ensure effective action is taken to safeguard other young people, where required, as well as the victim.

If a child has suffered significant harm, a referral will be made to Children's Services via the procedures outlined in this policy to ensure that the needs of both the victim and perpetrator(s)/s are the subject of professional risk assessments by social workers. Similarly, any instance of sexual activity between pupils whilst with Bright Outcomes will always be referred to Children's Services.

Responses to all incidents of both sexual violence and sexual harassment will be underpinned by the principles of zero tolerance of sexual violence and sexual harassment and support for both the child involved, be they alleged victim or alleged perpetrator

Risk Assessment

While it is not possible to anticipate every particular set of circumstances and therefore what the Bright Outcomes' response will be to every case, given the nature of in-home provision it is highly unlikely that risk assessments will be required to minimise risk between alleged victim(s) and alleged perpetrator(s).

The risk and needs assessment will consider:

- the victim, especially their protection and support.
- the alleged perpetrator(s) (if she/he/they attend the same Bright Outcomes); and
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.

The DSL (or a deputy) should ensure they are engaging with Children's Services, or the relevant Local Authority, 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. Bright Outcomes' risk assessment should not replace the detailed assessments of expert professionals. Any

such professional assessments should be used to inform the Bright Outcomes approach to supporting and protecting pupils and students and updating our own risk assessment.

Considerations following a Report

The DSL (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead Bright Outcomes initial response. Important considerations will include:

- 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 will 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. However, if the victim asks the Bright Outcomes not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of children.
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children. For example, is the alleged perpetrator(s) /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.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- whether there are ongoing risks to the victim, other children, adult students or Bright Outcomes staff.
- informing parents/carers (unless this would put the victim at greater risk).
- only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation. For instance, staff may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence or harassment.

Youth-Produced Sexual Imagery (Sexting)

It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic relationship and that she or he may do so without any intention to cause harm or distress to anybody. Although technically an offence, 'sexting' of that nature is referred to as 'experimental sexting' and it is usually not necessary or appropriate to criminalise young people in those circumstances.

However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern.

When concerns are identified, staff will always speak to children and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm. The DSL will also need to consider the Fraser guidelines in making a judgement about whether or not to respect a young person's request not to inform his/her parents/carers.

N.B. Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity involving under 13-year-olds will therefore be referred to the Police.

Serious Violence

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime; and are trained to record and report any concern about children at risk of or involved in perpetrating serious violence as with any other safeguarding concern. Indicators may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and/or criminal exploitation.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors both outside children's home environments and outside school or college; and/or can occur between children outside the school or college. The DSL, deputy DSLs and all staff will consider the context within which such incidents and/or behaviours occur. Contextual safeguarding means that assessments of children should consider wider environmental factors present in a child's life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence

with the Police in order to prevent children suffering harm. The Bright Outcomes will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children's Services, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse.

Child sexual exploitation and child criminal exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse. **Child criminal exploitation (CCE)** is a form of child abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:

- (a) in exchange for something the victim needs or wants; and/or
- (b) for the financial advantage or increased status of the perpetrator(s) or facilitator; and/or
- (c) through violence or the threat of violence
- (d) grooming behaviour

The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16- and 17-year-olds who can legally give consent to have sex.

Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they may have created and posted on social media).

CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health.

It may also be linked to other criminal activity including trafficking and illegal drugs. 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.

Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors

including gender, cognitive ability, physical strength, status and access to economic or other resources.

Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through grooming which may present as the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- a child travelling outside the area in which she/he lives in order to transport, distribute or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines** (see below).
- a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated.
- a child being forced to shoplift or pickpocket.
- a child being forced to threaten other young people.
- a child being forced to work in a cannabis factory.
- a child being forced or manipulated into committing vehicle crime or threatening/coming serious violence of others.
- a child can be threatened (and their families) with violence or entrap and coerce them into debt.
- They may be coerced into carrying weapons or begin to carry a knife for protection.
- a child being forced to commit crime in order to settle actual or fabricated debts.
- gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang.
- a child being encouraged or manipulated to commit crime via social media.
- a child receiving food, money, kudos or status in return for storing a weapon or drugs for others.
- It is important to note that the experience of girls who re criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of CCE too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- children appearing with money, clothes, mobile phones, etc. without plausible explanation.
- children who associate with other young people involved in exploitation.
- children in relationships with controlling or significantly older individuals or groups.
- children frequenting areas known for sex work and/or criminal activity.
- children who associate with gangs and/or become isolated from their peers/social networks.
- children receiving excessive texts/phone calls.
- multiple callers (unknown adults or peers) to children.
- concerning use of internet or other social media by children.
- increasing secretiveness around children's behaviours.
- children presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant.
- children self-harming or presenting with significant changes in their emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late.
- children who regularly miss school or education, have unexplained absences or do not take part in education.
- children being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into violence towards others by somebody who is exploiting them (for further information see).
- evidence of/suspicions of children suffering physical or sexual assault.

Although the following vulnerabilities increase the risk of child sexual and/or criminal exploitation, not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:

- having a prior experience of neglect, physical and/or sexual abuse.
- 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).
- recent bereavement or loss.
- social isolation or social difficulties.

- absence of a safe environment to explore sexuality.
- economic vulnerability.
- homelessness or insecure accommodation status.
- connections with other children and young people who are being sexually and/or criminally exploited.
- family members or other connections involved in adult sex work and/or other criminal activity.
- having a physical or learning disability.
- being looked after (particularly those in residential care and those with interrupted care histories).
- issues/anxieties about sexual identity.

A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Children's Services at the relevant local authority as with any other child protection concern. Parents will be consulted and notified as above and Bright Outcomes will work with multi-agency partners as required.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation and become victims of modern slavery as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes

include 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 perpetrator(s). It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

All forms of so-called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children's Services as with any other child protection concern; and may also contact the Forced Marriage Unit on 020 7008 0151 or via email at fm@fco.gov.uk for advice as necessary.

Female genital mutilation

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting harmful consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff will be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

(See <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines> for further information).

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern. The DSL will discuss the concern with Children's Services with a view to making a referral and will inform the Police as appropriate.

Indications that FGM may already have taken place may include a child:

- having difficulty or looking uncomfortable when walking, sitting or standing.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- having frequent urinary, menstrual or stomach problems.
- having prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return.
- being reluctant to undergo normal medical examinations.
- confiding in a member of staff without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs.

Staff are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Information on when and how to make a report can be found at: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>.

Staff in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police. A referral will also be made to Children's Services.

Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. School staff will be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under s.121 of the Anti-Social Behaviour, Crime and Policing Act 2014, 2024 – see <https://www.gov.uk/forced-marriage> for further information).

Radicalisation and Extremism

All education provisions are subject to a duty under section 26 of the Counterterrorism 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.

Some children are vulnerable to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the DSL is responsible for the school's strategy for protecting children from those risks.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including 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. Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development, they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas. Young people who feel isolated or disaffected in some ways are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Bright Outcomes is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism.

Staff are trained to report all concerns about possible radicalisation and extremism to

the DSL immediately as they would any other safeguarding concern, identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning, and expressions of interest in extremist ideas along with a tolerance towards potential violence to certain members of society.

Bright Outcomes recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, the DSL (or deputy) will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

Bright Outcomes will discuss any concerns about possible radicalisation identified with a child's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation. Subject to consultation with the Police PREVENT team and in the interests of making proportionate responses, the school may offer support to children and their families through the provision of early help as appropriate.

Looked After Children or Previously Looked After Children

The most common reason for children becoming children in care is as a result of abuse or neglect. Children who were previously children in care potentially remain vulnerable. Bright Outcomes ensures that staff have the necessary skills and understanding to keep children in care and children who were previously in care safe and ensures that appropriate staff have information about a child in care status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child

Children with a Social Worker

Bright Outcomes recognises that when a child has a social worker, that is an indicator that she/he may be more vulnerable to harm than other children as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

Bright Outcomes will take those issues and needs into account when making plans to support children who have a social worker.

Private Fostering Arrangements

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (*under 18 if the child has a disability*) by someone other than a parent or close relative*, in their own home, with the intention that it should last for 28 days or more. Children looked after

by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

*A close relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.

Private fostering occurs in all cultures including British culture, and a private fostering arrangement may start at any age.

Whilst most privately fostered children are appropriately supported, looked after and remain safe and well, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect; have been trafficked; are sexually or criminally exploited; or suffer modern-day slavery.

Parents and private foster carers both have a legal duty to inform Children's Services in the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Bright Outcomes has a mandatory duty to report to Children's Services in the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

Bright Outcomes staff should notify the DSL when they become aware of or suspect private fostering arrangements. The DSL lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, 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, development, and ability to learn.

Domestic Abuse Act 2021 The Act creates a statutory definition of domestic abuse based on the [existing cross-government definition](#).

'Abusive behaviour' is defined in the act as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse

- psychological, emotional or other abuse
- For the definition to apply, both parties must be aged 16 or over and 'personally connected'.

'Personally connected' is defined in the act as parties who:

- are married to each other
- are civil partners of each other
- have agreed to marry one another (whether or not the agreement has been terminated)
- have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- are or have been in an intimate personal relationship with each other have, or there has been a time when they each have had, a parental relationship in relation to the same child are relatives

The Act recognises children as victims of domestic abuse in their own right, statutory obligations to victims of domestic abuse are afforded to children too.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Services in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) refer any concerns to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Services where a child has been harmed or is at risk of harm.

Online Safety

See also: Youth Produced Sexual Imagery

Children and young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, TikTok, Snapchat and Instagram.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children, and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child criminal and sexual exploitation; county lines activity; radicalisation; sexual predation and cyber bullying.

It is essential that children are safeguarded from potentially harmful and inappropriate online material.

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

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to children online in the same way that they notice and report offline concerns.

Children who are Missing

Bright Outcomes recognises that children who go missing or are persistently absent are at increased risk of abuse, exploitation, and other serious harm, including mental health issues, substance abuse, or risks like FGM or forced marriage. Regular attendance monitoring can help identify emerging concerns and prevent children from becoming missing in education, especially for those already known to social care.

Following government guidance, every missing child must be offered a **Return Home Interview (RHI)** within 72 hours to explore the reasons for their absence. RHIs are conducted by independent practitioners to encourage honest discussions and may highlight problems at home, school, or in the community.

Bright Outcomes will support the RHI process by coordinating with the local authority, allowing time out of school for interviews, and providing a safe space where possible.

Consent for RHIs is usually sought from parents/carers. However, young people aged 16–17 can give or withhold consent themselves. Younger children may also be able to consent if deemed competent (using Fraser Guidelines). If not, parental consent must be obtained. If in doubt, schools should seek expert advice.

Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum that is delivered by a child's named school, and not Bright Outcomes.



Taking Action

Any child in any family supported by Bright Outcomes could become a victim of abuse.

SNAPSHOT

In an emergency take the action necessary to help the child, for example, call 999.

- Report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day using the reporting form: <https://tinyurl.com/LogConcern>
- You are able to refer directly to children's services using the contact details below
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family; and
- Seek support for yourself if you are distressed or need to debrief.

Staff should always maintain an attitude of "It could happen here".

Welfare Concern

There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. It is fine for staff to ask the pupil if they are OK or if they can help in any way. Staff should use the same 'Bright Outcomes: Logging a Concern' form (<https://tinyurl.com/LogConcern>) to record these early concerns. If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

Disclosure

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will need to let the pupil know that they must pass the information on

– staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen but if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

If pupils have been completing the Taking Care curriculum with their registered school, they will have been taught about confidentiality and will generally understand the concept of safe and unsafe secrets. They should have a good knowledge and understanding of why staff cannot keep some information confidential but also know that information is passed on the specific people on a 'need to know' basis only.

During their conversations with pupils' staff will:

- Allow them to speak freely.
- Remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Not be afraid of silences – staff must remember how hard this must be for the pupil.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this; (however, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g., when did this happen, where did this happen?).
- At an appropriate time tell the pupil that to help them, the member of staff must pass the information on.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong.
- Tell the pupil what will happen next.
- Let them know that someone (either you or another named person, e.g., the DSL will come to see them before the end of the day.
- Report verbally to the DSL.
- Write up their conversation as soon as possible on the record of concern and hand it to the DSL; and Seek support if they feel distressed or need to debrief.

Notifying parents

Bright Outcomes will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

However, if Bright Outcomes believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Services.

Making a referral to Children's Services

SNAPSHOT

Any member of staff may make a direct referral to Children's Services if they genuinely believe independent action is necessary to protect a child.

In situations where a child is in immediate danger, call 999 without delay

Local Authority	Referral Method	Urgent Referral	Out of Hours
Warwickshire	01926 414144	01926 414144	01926 886922
Coventry	Online Portal	024 7678 8555	024 7683 2222
West Northants	Online Portal	0300 126 7000	01604 626938

The DSL will make a referral to Children's Services if it is believed that a pupil is suffering or is at risk of suffering significant harm.

However, Keeping Children Safe in Education (2025) emphasises that Any member of staff may make a direct referral to Children's Services if they genuinely believe independent action is necessary to protect a child.

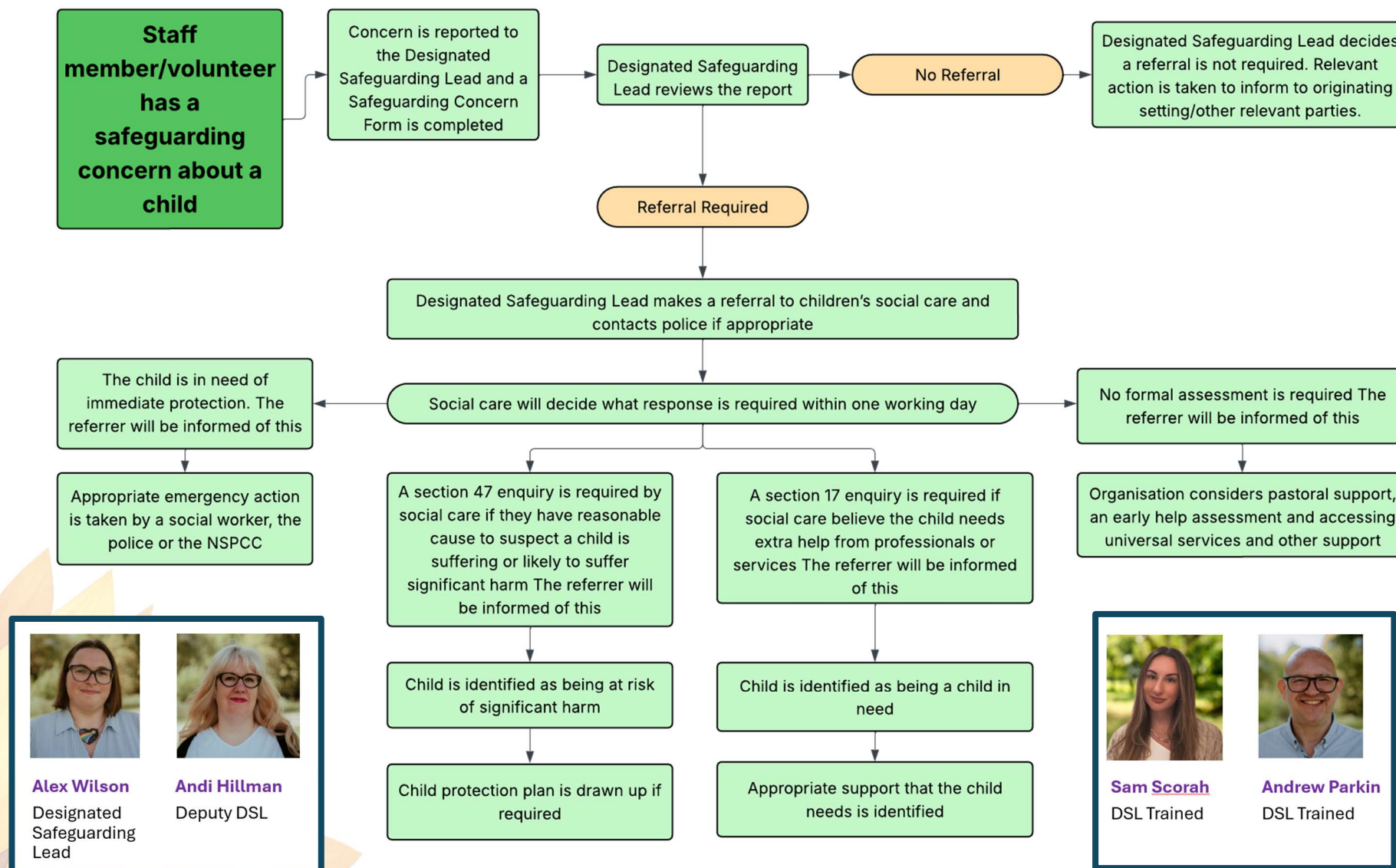
The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay.

When contacting Children's Services, be prepared to provide:

- Child's details (name, age, address)
- Family composition, including siblings and significant others
- Nature and immediacy of the concern
- Any previous support or interventions provided to the child or family
- Whether parents/carers have been informed of the concern and if consent has been obtained

This information will assist in determining the appropriate level of support or intervention require.

Process on receipt of a concern



Locality Procedures

	<u>Warwickshire</u>	<u>Coventry</u>	<u>West Northants</u>
Submitting Referrals	<p>All child protection concerns should now be directed to Family Connect by calling 01926 414144. This service operates Monday to Thursday from 8:30 AM to 5:30 PM, and Friday from 8:30 AM to 5:00 PM</p> <p>Professionals will engage in a discussion with a trained Child and Family Advisor or social worker to assess the situation and determine the appropriate course of action.</p>	<p>All child protection concerns should be submitted through the Coventry MASH online referral form, which can be accessed via the Coventry City Council website. This digital process ensures accurate and timely information sharing.</p> <p>Where immediate discussion is necessary, professionals can contact MASH directly. Telephone: 024 7678 8555 Email: mash@coventry.gov.uk</p>	<p>All child protection concerns in West Northamptonshire should be directed to the Northamptonshire Children's Trust (NCT) via the Multi-Agency Safeguarding Hub (MASH) via an Online Referral for non-urgent concerns.</p>
Urgent Safeguarding Concerns In situations where a child is in immediate danger, call 999 without delay.	<p>If a child is believed to be at immediate risk of harm, contact Family Connect immediately at 01926 414144</p>	<p>For urgent concerns that require immediate attention but are not emergencies, professionals should still complete the online referral and follow any additional guidance provided on the Coventry City Council website.</p>	<p>If a child is believed to be at immediate risk of harm call 0300 126 7000 to speak directly with a MASH professional. If the concern meets safeguarding thresholds, you'll be required to complete a written referral following the call.</p>
Children Known to Children's Services	<p>For children with an existing allocated social worker, the Designated Safeguarding Lead (DSL) should contact the social worker directly. If the social worker is unavailable, escalate the concern to their team manager. Do not redirect these concerns through Family Connect. / MASH</p>		
Out-of-Hours Concerns	<p>For urgent concerns outside of standard operating hours, contact the Emergency Duty Team at</p>		
	01926 886922	024 7683 2222	01604 626938.
Professional Consultation	<p>Professionals seeking advice or consultation regarding safeguarding concerns can contact Family Connect at 01926 414144 and select the appropriate option for professional inquiries.</p>	<p>Professionals seeking consultation or advice about safeguarding concerns can refer to the guidance provided on the Coventry City Council website or contact the appropriate team as directed.</p>	<p>Professionals seeking advice or consultation regarding safeguarding concerns can contact MASH at 0300 126 7000.</p>

Staff reporting directly to child protection agencies

Staff should ordinarily follow the reporting procedures outlined in this policy.

However, as highlighted above, all staff should be aware of the early help process and understand their role in it; and all staff should be aware of the process for making referrals to Children's Services and for statutory assessments under the Children Act 1989. **Any member of staff may therefore refer their concerns directly to Children's Services and/or the Police if:**

- the situation is an emergency and the DSL; Deputy DSL & Founder are all unavailable.
- they are convinced that a direct report is the only way to ensure the child's safety; or
- for any other reason they make a judgement that a direct referral is in the best interests of the child.

In any of those circumstances, staff may make direct child protection referrals and share information without being subject of censure or disciplinary action. However, staff should inform the DSL at the earliest opportunity that they have made a direct referral unless in their judgement doing so would increase the risk of harm to the child.

What will Children's Services do?

Children's Services should make a decision about the type of response that is required within one working day of a referral being made; and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required.
- whether the child is in need and should be assessed under section 17.
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under 46 section 47; (Chapter one of Working Together to Safeguard Children provides details of the assessment process)
- any services are required by the child and family and what type of services; and
- further specialist assessments are required in order to help the local authority to decide what further action to take.

Bright Outcomes will follow up if this information is not forthcoming and if, after a referral, the child's situation does not appear to be improving, the school will consider following the relevant local authority escalation protocol to ensure the referred

concerns have been addressed and, most importantly, that the child's situation improves.

If Children's Services decide to carry out a statutory assessment, Bright Outcomes staff will do everything they can to support that assessment, led and supported by the DSL (or deputy) as required.

Early Support (formerly Early Help)

Bright Outcomes recognises that offering early and proactive support is more effective in promoting the welfare of children than responding at a later stage. Early Support refers to providing help as soon as a concern is identified — at any point in a child's life — to prevent needs from escalating. The DSL is familiar with the Early Help process and where necessary will support this process in conjunction with the child's primary setting

Record Keeping

Bright Outcomes will maintain safeguarding (including early help) and child protection records in accordance with the guidance document provided by WCC Education Safeguarding Service Child Protection Record Keeping Guidance.

In accordance with that guidance, Bright Outcomes will:

Keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Services immediately.

- Keep records in a folder in a meticulous chronological order.
- Ensure all records are kept secure and in locked locations.
- Ensure all relevant child protection records are sent to the receiving school, college, or other education establishment when a pupil moves.

Safeguarding and child protection records will be maintained independently from the pupil's Bright Outcomes education file. Such records will only be accessible to the Designated Safeguarding Lead and Bright Outcomes senior management team who need to be aware.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated, and timed by the member of staff making the record. Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version, but it

is most important that all staff use one consistent system for the recording of concerns and that all records are passed to the Designated Safeguarding Lead, who should complete the form to confirm what action has been taken. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Founder or DSL, who will advise them to submit a Freedom of Information request for consideration.

The Data Protection Act does not prevent Bright Outcomes staff from sharing information with relevant agencies, where that information may help to protect a child.

Confidentiality

Confidentiality will be maintained appropriately. Staff may share information without consent if a child is at risk. All decisions about sharing must be recorded.

Support for those involved in a Child Protection Case

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

Bright Outcomes will support pupils, their families, and staff by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest.
- Storing records securely.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety.
- Offering details of helplines, counselling, or other avenues of external support.
- Following the procedures laid down in our child protection, whistleblowing, complaints, and disciplinary procedures.
- Co-operating fully with relevant statutory agencies.

Staff & Volunteers

Conduct

All staff and volunteers must:

- Treat children with respect.
- Maintain appropriate boundaries and avoid favouritism.
- Only communicate via Bright Outcomes approved methods on virtual numbers and email.
- Ensure any photos taken for Evidence for Learning should not contain the child or young person's face or other identifying features.
- Follow guidance on lone working.

Please read the staff code of conduct in addition to this policy.

Abuse of Trust

All Bright Outcomes staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards young people must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual.

This means that any sexual activity between a member of Bright Outcomes staff and a young person under 18 may be a criminal offence, even if that young person is over the age of consent.

Bright Outcomes Home-Based Behaviour Policy for 1:1 Mentor and Education Staff (Code of Conduct) sets out our expectations of staff and is signed by all staff members.

Communication between staff and pupils

Staff should maintain appropriate boundaries when communicating with children who are part of the Bright Outcomes community. Communication should always be through the child's parent. Should the child wish to contact a staff member directly, this should be done via email.

Staff will also receive advice regarding their personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules. Staff found to be in breach of these rules may be the subject of a referral to the LADO and/or may be subject to disciplinary action.

Post Employment

It is not appropriate for employees to have contact with young people and families for 5 years after they have left Bright Outcomes.

References may be amended or withheld if safeguarding concerns arise after employment ends, and we reserve the right to disclose this information where it is in the interest of child protection.

Safer Recruitment

Bright Outcomes endeavours to ensure that we do our utmost to employ 'safe' staff and allow 'safe' volunteers to work with children by following the guidance in Keeping Children Safe in Education 2025 together with WSCB and Bright Outcomes' Safer Recruitment policies. In summary, this includes

- Conducting enhanced DBS and barred list checks where applicable
- Obtaining references and verify identity and qualifications
- Including safeguarding responsibilities in job descriptions

Volunteers and contractors will not work unsupervised unless appropriate checks have been completed.

Full information about Bright Outcomes 'Safer Recruitment' procedures can be found in the appendices.

Training

All staff receive appropriate safeguarding and child protection training (including online safety) at induction and at least annually. They must understand signs of abuse, how to respond, and how to escalate concerns.

In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern.

New staff and volunteers who will have direct contact with children and volunteers will receive training during their induction which will include:

The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

All staff, including the Founder and volunteers will receive appropriate, **regularly updated safeguarding training and child protection training** and thematic updates to include online safety as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance and any requirements of the local safeguarding partnership.

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

All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, children in care , previously children in care and young carers, as well as risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, county lines activity, peer on peer abuse, sexual harassment and sexual violence in school, extremism, so-called honour based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping children safe online.

In addition, selected members of the Senior Management Team will attend safer recruitment training, and the school will ensure that there are at least two school leaders and/or governors that have attended safer recruitment training within the past three years.

Managing Allegations Against Staff

SNAPSHOT

All allegations that a staff member has harmed or poses a risk to a child must be referred to the Founder and reported to the Local Authority Designated Officer (LADO) within one working day. If a member of staff has an allegation about the Founder, these must be reported to the LADO directly.

Area	Preferred Contact Method	Contact Details
Coventry City	Online Form via website	lado@coventry.gov.uk

Warwickshire	POT MARF via Website / 01926 745376	lado@warwickshire.gov.uk
West Northamptonshire	Online Form	LADOConsultations@NCTrust.co.uk

When an allegation is made against a member of staff, set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Part 4 of *Keeping Children Safe in Education 2025*

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. 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.

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

As stated above, all allegations against staff should be reported to the Founder. Allegations against the Founder should be reported to Warwickshire LADO. Staff may also report their concerns directly to the Police or Children's Services if they believe direct reporting is necessary to secure action.

Staff, parents, and partners 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.

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

As required by *Keeping Children Safe in Education 2025* all allegations in respect of an individual who works at Bright Outcomes, including supply teachers, volunteers and contractors that fulfil any of the following criteria will be reported to the LADO within one working day if they have:

- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.

- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (Includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, this is known as transferable risk)

It is the founder's responsibility to contact and refer to the LADO when necessary. The only exception is when the allegation is against the founder, in which instance concerns should be referred directly to the LADO using the details as above.

The LADO contact details are at the start of this section.

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

Low level concerns

The term 'low-level' concern does not mean that it is insignificant. 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 Bright Outcomes 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 harm threshold or is otherwise not 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, contrary to Bright Outcomes policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils

All low level concerns, of any nature, should be shared with the DSL or Founder without delay, at a minimum during monthly supervision sessions. The Founder will be the ultimate decision maker in respect of all low-level concerns.

Low-level concerns which are shared about supply staff and contractors **should** be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they **should** consult with their LADO.

Whistleblowing

Staff who are concerned about the conduct of a colleague - including visiting professionals and volunteers - towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation, and they will wonder whether a report could jeopardise a colleague's career. **All staff must remember that the welfare of the child is paramount.**

Bright Outcomes' whistleblowing policy enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may seem minor contraventions of Bright Outcomes' Staff Behaviour Policy (Code of Conduct) – to the Director; to facilitate proactive and early intervention to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse at The Bright Outcomes

The recommended format for all staff at Bright Outcomes to record any such poor practice or possible child abuse by colleagues or other adults who work with children is via the online forms "Concern about a Staff Member" or "Concern about Partner Agency Staff".

Alternatively, staff are free to approach the Founder directly to discuss their concerns.

Concerns or complaints about the Founder should be reported to Warwickshire County Council LADO or the relevant local authority the area within which Bright Outcomes are working.

Staff may also report concerns about suspected abuse or neglect directly to Children's Services or the Police if they believe direct reporting is necessary to secure action.

Staff can also contact the Designated Officer in the Local Authority, who is responsible for the coordination of responses to allegations against people who work with children.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m. Monday to Friday or e mail help@nspcc.org.uk.

The NSPCC whistleblowing helpline and contact numbers for Children's Services, the Police and the Designated Officer are all made available to staff members.

Policy Review

This policy is reviewed annually or after any significant incident or legislative change.

Last reviewed: July 2025

For full details or procedures, contact a DSL or refer to the Safeguarding Folder on the Bright Outcomes shared drive.

Data, Confidentiality & Information

SNAPSHOT

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

The Data Protection Act 2018 (DPA) and the GDPR places duties on the school and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

However, neither the DPA nor the GDPR prevent or limit the sharing of information for the purposes of keeping children safe. KCSiE 2025 states clearly that "Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children".

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency as required (e.g., Education Safeguarding Manager).

It is reasonable for staff to discuss day-to-day concerns about pupils with colleagues to ensure that children's general needs are met at Bright Outcomes. However, staff

should only refer child protection concerns to the DSL or Founder or, in the case of concerns about the Founder, directly to the LADO. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

***Keeping Children Safe in Education 2025* emphasises that the DSL or a deputy DSL should always be available to discuss safeguarding concerns but in exceptional circumstances where neither the DSL nor any appointed deputy DSL are available, that should not delay appropriate action being taken and staff should speak to a member of SLT or take advice from Children's Services if they are concerned about a child.**

Information Sharing

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL and data protection officer.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which require that sensitive information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

Photography & Images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils, we will:

- seek their consent for photographs or video images to be taken.
- seek parental consent.
- if pupils are featured in the photo, ensure that their faces are obscured and that they are appropriately dressed; and
- encourage pupils to tell us if they are worried about any photographs/images that are taken of them.

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

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

For the protection of pupils and staff, images should only be taken, when necessary, in line with the guidance above and should be deleted from the device at the earliest possible opportunity.

Data Storage

Record of concern forms and other written information will be stored in a locked facility, and any electronic information will be stored securely and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

Transfer of Records

Safeguarding records & information should be shared with the commissioning setting as soon as reasonably practicable. If a child or young person is changing to a different provision, it is the commissioning settings responsibility to ensure that those records are passed on unless we are directly requested to by the commissioning setting.

Appendices

Appendix A: Roles & Responsibilities

Description of Roles & Responsibilities for the Designated Safeguarding Lead and Deputies:

The Designated Safeguarding Lead and Deputies:

- Are senior members of staff from the Bright Outcomes leadership team and, therefore, have the status and authority within Bright Outcomes to carry out the duties of the post, including committing resources and supporting and directing other staff.
- Take lead responsibility for safeguarding and child protection in Bright Outcomes, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies.
- Are appropriately trained, receive refresher training at two-yearly intervals and regularly (at least annually) update their knowledge and skills to keep up with any developments relevant to their role.
- Act as a source of support and expertise to the Bright Outcomes community.
- Encourages a culture of listening to children and taking account of their wishes and feelings.
- Are alert to the specific needs of children in need, those with special educational needs, looked after children and young carers.
- Have a working knowledge of Safeguarding Warwickshire (WSCB) procedures and/or other local authority procedures.
- Keep detailed written records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from each young person's general file.
- Refers cases of suspected abuse to Social Care or the Police as appropriate.
- Notifies Children's Services if a child with a child protection plan is absent for more than two days without explanation.
- Ensures that when a young person leaves Bright Outcomes, all child protection records are passed to the new educational setting (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained. If the child is the subject of an open case to Children's Services, the pupil's social worker is also informed.
- Attends and/or contributes to child protection conferences, strategy meetings and multi-agency child exploitation (MACE) meetings.
- Coordinates Bright Outcomes' contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- Develops effective links with relevant statutory and voluntary agencies.

- Ensures that all staff sign to indicate that they have read and understood the child protection and safeguarding policy and staff behaviour policy (Code of Conduct).
- Has a working knowledge of relevant national guidance in respect of all specific safeguarding issues, ensuring that all staff receive necessary training, information, and guidance.
- Ensures that the child protection and safeguarding policy and procedures are regularly reviewed and updated annually, working with the whole Bright Outcomes community of young people, parents, staff, volunteers, and governors and/or proprietors regarding this.
- Keeps a record of staff attendance at child protection training.
- Makes the child protection and safeguarding policy available publicly, i.e., on the Bright Outcomes website or by other means.
- Ensures parents are aware of Bright Outcomes' role in safeguarding and that referrals about suspected abuse and neglect may be made.
- Ensures that the Founder is aware of the responsibility to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

The Founder

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

Allocates sufficient time, training, support, and resources, including cover arrangements, when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.

Supports the CLA Education Welfare Officer to promote the educational achievement of any pupils who are looked after by the Local Authority and to ensure that all staff have the skills, knowledge and understanding necessary to keeping looked after children safe.

Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures.

Ensures that pupils are provided with opportunities throughout the curriculum to learn about safeguarding and how to always keep themselves safe, including when online, as part of a broad and balanced curriculum.

Refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation.

Ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the Designated Officer.

Appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made.

Appendix B: Safer recruitment

Bright Outcomes endeavours to ensure that we do our utmost to employ 'safe' staff and allow 'safe' volunteers to work with children by following the guidance in Keeping Children Safe in Education 2025 together with WSCB and Bright Outcomes' Safer Recruitment policies.

Safer recruitment means that all applicants will:

- Complete an application form which includes their employment history and explains any gaps in that history.
- Provide two referees, including at least one who can comment on the applicant's suitability to work with children.
- Provide evidence of identity and qualifications.
- If offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include an enhanced DBS check and a barred list check for those engaged in Regulated Activity.
- If offered employment, provide evidence of their right to work in the UK.
- Be interviewed by a panel of at least two Bright Outcomes leaders/governors, if shortlisted. Bright Outcomes will also:
- Ensure that every job description and person specification for roles in Bright Outcomes includes a description of the role holder's responsibility for safeguarding.
- Carry out an online search as part of due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.
- The Bright Outcomes will inform shortlisted candidates that online searches may be done as part of due diligence checks
- Ask at least one question at interview for every role in Bright Outcomes about the candidate's attitude to safeguarding and motivation for working with children.

- Verify the preferred candidate's mental and physical fitness to carry out their work responsibilities.
- Obtain references for all shortlisted candidates, including internal candidates.
- Carry out additional or alternative checks for applicants who have lived or worked outside the UK.
- Ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State.
- Check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an independent school, academy, or free school.
- At least one member of each recruitment panel will have attended safer recruitment training.
- All new members of staff and volunteers will undergo an induction that includes familiarisation with Bright Outcomes' child protection and safeguarding policy, Staff Behaviour Policy (Code of Conduct), other issues as in section 14 of this policy and identification of their child protection training needs.
- All staff are required to sign to confirm they have received a copy of the child protection and safeguarding policy and Staff Behaviour Policy (Code of Conduct).
- Bright Outcomes maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of Keeping Children Safe in Education and guidance issued by Warwickshire County Council.

Volunteers

- Volunteers will undergo checks commensurate with their work in the school and contact with pupils.
- Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in Regulated Activity.
- The DBS does not charge for checks on volunteers. However, if schools or colleges use an external organisation to carry out the check, there may be an administration charge.

Supervised volunteers

Volunteers who work only in a supervised capacity and are not in Regulated Activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

Contractors

Bright Outcomes checks the identity of all contractors and their staff and requests DBS checks where appropriate. As required by statutory guidance, where contractors and/or their staff are engaged in Regulated Activity, barred list checks are also requested. Contractors and any of their staff who have not undergone checks will not be allowed to work unsupervised or in Regulated Activity.

