



BRIGHT CENTRES

WORKING TOWARDS A BRIGHTER FUTURE

Child Protection Policy

Bright Centres

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Child Protection Policy

Bright Centre is committed to providing a safe and secure environment for young peoples, where children feel safe and are kept safe and all where staff contributes to the culture of vigilance which is embedded in our centre. All adults at Bright Centres recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children or not. In adhering to this policy, and the procedures therein, staff and visitors will promote a climate where children and adults will feel confident about sharing any concerns that they may have about their own safety or the well-being of others and will contribute to Bright Centre's delivery of the best outcomes to all children, as set out in s10 (2) of the Children Act 2004¹. This Child Protection Policy is one element within our whole centre arrangements to Safeguard and Promote the Welfare of Children in line with our statutory duties set out at s175 of the Education Act 2002 and s11 of Children Act 2004

Our centre's Child Protection Policy also draws upon the guidance contained in 'Out Of School Settings for Children' guidance, September 28th 2021, "Working Together, 2019", the "London Child Protection Procedures" and especially DfE Guidance "Keeping Children Safe in Education, Sep 2021". These documents are kept in the Director, either in hard copy or electronic version on our website.

We recognise that safeguarding is more than contributions to Child Protection matters and we will use the curriculum generally, and PSHE in particular, to ensure our pupils recognise risk and build resilience to manage any such risk themselves where appropriate to their age and ability. Pupils will be encouraged to make use of internal systems Suggestion BOX to whistle blow or raise any issue of safety in confidence.

We also recognise and accept that children have a right to be heard and will additionally facilitate this by Centre student council and where applicable we will review and modify our policies accordingly. Additionally, we will work in partnership with parents and carers and will encourage parents to comment on and contribute to the evolution of our policies by Feedback and suggestion box at the Centre.

In liaising with parents and carers we will ensure that they are reminded that Bright Centres has a duty to report concerns that we may have over the safety or well being of a pupil as part of our statutory duties to protect children from significant harm and/or neglect. Parents and carers will also be reminded that, where appropriate, any referral will be discussed with parents and carers before the referral is made, however parents and carers will not be contacted nor will the referral be discussed where it is felt that to do so will place the child at an increased risk of harm.

In any event parents and carers will be reminded that all referrals are made in the best interest of the child.

Where a pupil is subject to a Child Protection Plan the Designated Safeguarding Lead (DSL) will monitor the pupil and the plan and ensure that the recommendations for Bright Centres as part of that CP Plan are delivered upon and the outcomes fed back as part of the child protection review process.

¹ the physical, mental health and emotional well-being of children; the protection of children from harm and neglect; the education, training and recreation of children; the contribution made by them to society; and their social and economic well-being.

The Director will also ensure that a member of teaching staff is appointed as the Designated Teacher for Children Looked After (DTCLA). This person will promote the educational achievement of our CLA Children and will also contribute to the 'in care reviews' and/or meetings regarding CLA children and to the child's Personal Education Plan (PEP).

In delivering our responsibilities as set out in this policy Bright Centres will develop effective links with relevant agencies and co-operate with their child protection enquiries as appropriate, this will include providing reports and attending Child Protection Conferences and Reviews, Core Group Meetings, and CLA Reviews as requested. We will understand our role in these forums and will make the appropriate challenges to ensure decisions are made in the best interest of our pupil (and their siblings) to ensure the best possible outcomes. Where staff other than the DSL attends any of the aforementioned meetings Bright Centres will ensure that they are properly trained to do so and by attending

such meetings they will have been given the appropriate authority to make decisions and commit resources on behalf of the centre.

Following such meetings, we will ensure that all relevant information is co-ordinated and shared by printed version or online.

Child Protection

All staff at Bright Centre must recognise and accept that children have a fundamental right to be protected from harm. In upholding this fundamental right, we recognise that there are four definitions of child abuse, including neglect, as defined in Chapter 1 of the 5th edition of the London Child Protection Procedures and as précised in this policy, which should be consulted as a reference document for full details of the definitions and recognition & response.

The four categories of child abuse are as follows:

- 1. Physical Abuse**
- 2. Emotional Abuse**
- 3. Sexual Abuse, and**
- 4. Neglect**

Physical Abuse

May include: Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child including the deliberate fabrication or causation of illness in a child (now known as Fabrication or Induced Illness or FII).

May be recognised by: Physical injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour or learning difficulties due to neurological damage. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury. Other indicators of physical abuse may include flinching or cowering and accounts of how injuries have happened may be vague to inconsistent or are unexplained. Children may wear inappropriate clothing to cover marks or injuries and/or may be reluctant to go home.

It is not uncommon for children to have accidental bruises but bruising on the face, around the eyes, around the mouth, behind the ears or consistent with a grab or have the shape of an object (E.G brush, slipper, belt, hand etc) must be considered as possible indicators of harm as should multiple or repeated bruising to an area such as the head or an area unlikely to be bruised accidentally.

It is not appropriate for any member of staff to undress, photograph or body map any child in an attempt to see physical injury, this is the role of child protection and investigating agencies.

Emotional Abuse

May Include: 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse, so presence of emotional abuse may indicate other abuse is prevalent as well.

Sexual Abuse

May Include: Involving or forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. Such activities may involve sexual acts (penetrative or non-penetrative) or may include involving children in watching or taking part in pornographic material or to encourage children to behave in sexually inappropriate ways.

May be recognised by: Inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports / PE etc, pain or itching in genital area, blood on underclothes, bruising in genital region and / or inner thighs etc.

A sexually abused child may also be recognised by disturbed behaviour such as sadness, depression or loss of self esteem. Disclosure of sexual abuse must be taken seriously as it is recognised that children are frequently scared to disclose due to guilt or fear and often children have taken great courage to disclose – therefore it is important not to minimise or give your own view or interpretation of their account.

All staff must be aware that a child under the age of 13 years is not legally capable of consenting to sexual activity and so sexual activity with a child under 13 is an offence under the Sexual Offences Act. Such activity will be taken to indicate that that child/ren are at risk of significant harm and must be referred accordingly in line with the agreed procedures as set out in the London Child Protection Procedures. Sexual activity with a child under 16 is also an offence but may possibly be less serious than that of a child under 13, especially where children are of a similar age and there is no power imbalance, coercion, or disinhibitor such as alcohol or drugs involved. However serious consideration will always need be given as to whether to refer where cases of sexually active children become known or are disclosed; as per the London Child Protection Procedures. In all cases you must discuss your concerns or share your knowledge with our Designated Safeguarding Lead for consideration of a referral to Social Care.

In light of the above all staff must recognise that sexual abuse of children is not an exclusively male practice and may be perpetrated by females but also other children; such abuse must not be treated with any less rigour in such cases.

See also the section on Child Sexual Exploitation (CSE).

Neglect

May include: 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 (growth and intellect) such as failing to provide adequate food, shelter (including keeping children safe), clothing, or neglect of or unresponsiveness to a child's basic emotional needs.

May be recognised by: Being constantly hungry; constantly tired; have a poor state of clothing; be emaciated; have untreated medical problems; be frequently late or have poor or non-attendance at school; have low self esteem; display neurotic behaviour and/or have poor social relationships, have poor personal hygiene. A neglected child may also be apathetic, fail to thrive, be left with or in the care of adults under the influence of alcohol or drug misuse, or be left home alone².

Whilst we understand that children are resilient we will be alert to the negative cumulative effects of multiple instances of neglect. We also understand that such cumulative effects may overwhelm our pupil(s) and lead to poor outcomes. Therefore, we will not view single instances of neglect in isolation from any previous instances of neglect and will make a referral to children's social care accordingly.

² Whilst there is no set age in law for a child to be legally left home alone the responsibility rests with the parents to make satisfactory arrangements for the care of their children and must not leave their children unsupervised in a manner likely to cause unnecessary suffering or injury to health of the child. A referral will be made to Social Care where our centre has concerns that the arrangements that a parent makes is unsafe and thus renders the child/ren at risk of significant harm; this may also include independent travel arrangement and collection / escorting arrangements by others, including siblings, that the school considers unsafe.

Child on Child Abuse

We often consider that most abuse is perpetrated by adults on children and we have a legal duty to uphold a child's fundamental right to be protected from harm, however we must also be aware that children can and do abuse other children in the ways outlined in this policy and the child's right to be protected from harm equally apply in such cases, even in situations where the child may be unaware that they are being abused. To this end we must be alert to this possibility and respond as we would if the abuser was an adult; following the procedures laid down in at Chapter 16 of the London Child Protection Procedures (5th Edition).

It must be remembered that staff responding to such instances should be alert to the risk the child poses to other children in addition to the risk to the victim(s). It must also be remembered that children who harm others are likely to have considerable needs themselves and may have witnessed violence in the family or have been exposed to physical or sexual harm themselves, or may have committed other offences.

Bullying

Bullying is a specific form of abuse which may be prevalent and is defined as deliberately hurtful behaviour, usually repeated over a period of time where it is difficult for the victims to defend themselves; this may also be seen as child on child abuse as noted above.

The extent of bullying can include emotional and / or physical harm to such a degree that it constitutes significant harm, as set out in the definitions above, due to the extent to which it affects the health or development of the child subject to the bullying behaviour. Bullying may also be perpetrated within digital or ICT based environments, sometimes known as Cyber-Bullying, and may include 'Sexting'; which must be treated as seriously as any other form of bullying and dealt with accordingly.

It must be noted that bullying may also constitute criminal behaviour and therefore certain instances of bullying may need to be reported to the police.

Please refer to our separate Anti-Bullying Policy and Acceptable Use of Digital Technologies Policy for further information.

Child Sexual Exploitation

We recognise that the sexual exploitation of children is a particular form of child sexual abuse and involves exploitative contexts and relationships where the child receives 'something' such as food, accommodation, drugs, alcohol, cigarettes, affection, gifts or money etc. as a result of performing, and/or others performing on them, sexual acts or activities.

We also recognise that Child Sexual Exploitation can occur through use of technology without the child's immediate recognition, for example the persuasion to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young people's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Criminality and associations with local gangs can increase the risks of young people being sexually exploited.

We are aware that in many cases the child may not understand or even believe that they are part of a sexually exploitative arrangement and to that end may encourage other peers to become sexually exploited, knowingly or otherwise.

We will attend and cascade as appropriate relevant training on CSE so that we understand CSE as a staff group and will use the CSE Risk Matrix when assessing whether a child is at risk of CSE.

The following member of staff has lead responsibility for CSE. Issa Issa Centre Director Yazeed Hamad

Domestic Violence

We recognise that Domestic Violence (DV) usually impacts on all aspects of a child's life only varying according to the child's resilience or otherwise to his or her particular circumstances. We also recognise that even where the child is not the direct target of the DV the harm caused to the child/ren can be significant through emotional and physical abuse and often neglect as the victim's capacity to parent effectively and protect their child/ren is diminished through a preoccupation with their own survival at the expense of an awareness of the effect that the abusive relationship is having on their child/ren

At BC we will be alert to the possibility of Domestic Violence and allow an opportunity for the abused partner (predominantly the woman but not exclusively so) to disclose. We will treat that disclosure sensitively and refer the matter to Social Care where there is a child or children at risk of significant harm and/or neglect or signpost the abused person to the appropriate protective / supportive services.

We also recognise that other practices are defined as Domestic Violence, such as so called Honour Based Violence, Forced Marriage and Female Genital Mutilation. The definition of Domestic Violence, revised in 2013, also includes, any pattern of controlling or coercive or threatening behaviour, (psychological, physical, sexual, financial or emotional) between those aged 16 or over who are or who have been intimate partners or family members regardless of gender or sexuality.

Forced Marriage

In Bright Centre we recognise that forced marriage as an abuse of human rights and a form of domestic abuse and, where it affects children and young people, child abuse.

Forced marriage, as distinct from arranged marriage, is conducted without consent and under duress. We therefore accept that coercion and duress may be perpetrated by partners but also by extended family members and that this constitutes Domestic Violence, in line with the Government's definition of domestic violence and is closely linked to so called Honour Based Violence.

In cases of forced marriage, we will follow the guidance as set out in the London Child Protection Procedures as a child who is being forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. If any member of staff receives a disclosure or is aware that a Forced Marriage is about to happen this must be disclosed to the Designated Senior Lead Person for Child Protection without delay so that the appropriate referrals may be made and/or protective measures may be put in place, especially as the child/ren may be taken out of the country.

Female Genital Mutilation (FGM)

It is accepted that some female pupils in our centre may be at risk of being subject to Female Genital Mutilation (FGM) FGM is defined by the World Health Organisation as: all procedures, but not therapeutic or essential surgical operations, which involve partial or total removal of the external female genitalia or injury to female genital organs for non-therapeutic reasons. FGM is considered as a cultural norm by some communities and some also consider FGM necessary for religious reasons.

We will always challenge such abusive cultural norms as the welfare and safety of the child is always paramount, equally we also recognise that FGM is not endorsed as a religious practice.

In any event it is illegal in the UK to subject any child to FGM. It is also illegal take a child abroad to undergo FGM. This applies equally to one of our pupils who is a UK national or is habitually resident in the UK. Bright Centre will

follow the procedures for dealing with cases of FGM as set out in the London Child Protection Procedures, the Serious Crime Act 2015 and any procedures on tackling FGM as set out by the Lambeth Children's Safeguarding Board. We will always seek advice before making a referral to Children's Social Care, however in cases where the removal of a child from this country for FGM is imminent we will contact the Police directly.

From a Child Protection perspective, a child for whom FGM is planned is at risk of significant harm through physical and emotional abuse, it may also be considered as sexual abuse.

Typical identifiers / triggers are:

- Family comes from a community known to practice FGM
- Family / child talks about a long holiday
- Family / child may have asked to be excused PE / swimming on return
- Family / child may confide that she is going to a 'special ceremony' when on holiday
- Female child is known to have a mother that has been subject to FGM
- Female child is known to have a sister that has already undergone FGM
- Family are socially isolated or less well integrated into UK society
- Family withdraws female child from PSHE / SRE – to keep child less informed about their body

We will identify and monitor any pupil at Bright Centres who may be at risk of FGM.

Equally the pupil may be aware of what is going to happen and make a disclosure / seek help.

If any member of staff receives a disclosure or is aware that a FGM is about to happen this must be disclosed to the Designated Senior Lead Person for Child Protection without delay so that the appropriate referrals may be made and/or protective measures may be put in place, especially as the child/ren may be taken out of the country.

Under s74 of the Serious Crime Act 2015 where a child has disclosed that they have undergone FGM the education professional (teacher, support staff or volunteer) in our centre to whom the disclosure is made has the duty placed on them, by law, to report this to the Police via the 101 line. That education professional will need to provide the Police with the girl's name, date of birth, address, plus the contact details of the education professional and our designated safeguarding lead. We will support our member of staff with this process as far as we are able but at all times on the understanding that the duty to report the FGM rests with the individual and not the centre.

When discussing FGM with the family we will NOT use other family members, friends, neighbours or persons of respect or high standing within that community as an interpreter.

Extremism and Radicalisation

Please refer to our Extremism and Radicalisation Safeguarding Policy for the full procedural framework on our safeguarding duties in protecting our pupils from extremism and radicalisation.

We will carry out a self-evaluation and risk assessment of our centre, as per statutory guidance, to assess the potential risk of radicalisation to our pupils and staff. We will help support pupils who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a pupil is being directly influenced by extremist materials or influences we will make the appropriate referrals. In such instances our centre will ensure that pupil is offered mentoring and seek external support from the Local Authority and/or local partnership structures working to prevent extremism through the PREVENT and CHANNEL programmes

However, staff at Bright Centres will be alert to the fact that whilst Extremism and Radicalisation is broadly a safeguarding issue there may be some instances where a child or children may be at direct risk of harm or neglect. For example; this could be due to a child displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with. Equally staff may become aware of information about a child's family that may equally place a child at risk of harm or a pupil may disclose that they are being exposed to extremist views or practices at home or in their community. (These examples are for illustration and are not definitive or exhaustive)

Therefore, all adults working in Bright Centres (including visiting staff, volunteers' contractors, and students on placement) are required to report instances where they believe a child may be at risk of harm or neglect to the Designated Safeguarding Lead or Head teacher, including any harm believed to be through extremism or radicalisation.

In line with our commitment to ensure every child has the right to be heard children may disclose to an adult member of staff any abuse or neglect they may be subject to, however in recognising that children can and sometimes do abuse other children our pupils may also report such abuse by

All pupils in BC are aware of a number of staff members who they can talk to. The Centre is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All pupils know that we have a senior member of staff with responsibility for safeguarding children and know who this is. We inform pupils of whom they might talk to, both in and out of Centre, their right to be listened to and heard and what steps can be taken to protect them from harm.

Our centre will ensure that pupils are made aware that information can be accessed via a range of sources, including, helplines, posters, NSPCC and Childline 'kidzone' website, CEOP.

BEC arrangements for consulting with and listening to pupils encompass a range of approaches:

One-to-one SLT mentoring.

Student Council

Reviews

Open-door policy

We make pupils aware of these arrangements through indication and implementation of the regular consultation cycle

The Designated Safeguarding Lead is: Issa Issa, Hamdi Aden, Yazeed Hamad ,

Where a disclosure is made by a child or where there are signs that a child is suffering significant harm or is likely to suffer significant harm or is being neglected the Designated Safeguarding Lead may take advice before making a referral to Lambeth's Referral and Assessment (R&A) Duty Intake Team / Multi Agency Service Hub (MASH).

Where there are any doubts as to the seriousness of this concern or disagreement between the Designated Safeguarding Lead and the member of staff reporting the concern, advice will also be sought from the Head Teacher (if not the same person) and/or Lambeth Children's Social Care Duty Intake Team and/or the Local Authority Lead Officer for Education Safeguarding (Graham Griffin) or his deputy.

In circumstances where a child has a suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency assistance. If a pupil is thought to be at immediate risk (because of parental violence or intoxication, for example) urgent police intervention may be requested. Particular vigilance will be exercised in respect of children who are known to be subject to a Child Protection Plan and any incidents or concerns involving these children will be reported immediately to Lambeth Children's Social Care (and confirmed in writing). This will also be the case for other children who may be considered vulnerable such as disabled children, SEN children or Children Looked After for example. In all cases of injury to a child consideration will always be given as to whether an urgent paediatric medical assessment is required to document injuries or to protect any forensic evidence.

Where it is suspected that a child may be at further risk of significant harm if the parent is spoken to, nothing will be said to the child's parent/carer without first discussing the matter with Lambeth Children's Social Care R&A Duty Intake Team.

All staff must understand that there are no circumstances under which a member of staff may promise a child that they will keep any disclosure a secret or confidential – they must always pass this information on in the best interest of the child

Role of the Designated Safeguarding Lead

The Designated Safeguarding Lead works in line with the responsibilities as set out at Annex B of the DfE Guidance; Keeping Children safe in Education 2021 in respect of referrals, training and awareness raising. The Designated Safeguarding Lead is the focus person and local 'expert' for centre staff, and others, who may have concerns about an individual child's safety or well-being and is the first point of contact for external agencies that are pursuing C.P. investigations.

The Designated Safeguarding Lead also co-ordinates the centre's representation at C.P conferences/core groups and the submission of written reports for such CP meetings. The Designated Safeguarding Lead will ensure that if staff members other than the Head teacher or a Deputy are to attend a child protection meeting that they are appropriately trained to do so and have been given the authority to make decisions and commit resources on behalf of the centre.

When an individual concern/incident is brought to the attention of the Designated Safeguarding Lead they will be responsible, if appropriate, for obtaining advice from Local Authority Lead Officer for Education Safeguarding (Graham Griffin) or his deputy and/or consulting with Lambeth Children's Social Care as appropriate to decide whether or not this should be formally referred as a child protection case.

The Designated Safeguarding Lead will ensure that all child protection records are kept separately from pupil records are stored securely, by encryption and/or password protecting electronic files or ensuring that paper records are secured in a locked cabinet with restricted access.

The Designated Safeguarding Lead will have oversight of the delivery of centre's recommendations within Child Protection Plans and will disseminate information to relevant staff members as appropriate. The Designated Safeguarding Lead will keep the Head teacher, and Governing Body advised of all such matters including where Child Protection Plan recommendations are met or otherwise.

Role of Trustee Body

In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education, Sep 2021' and the Out Of School Settings guidance 2021 the governing body will challenge the centre's senior management team on the delivery of this policy and monitor its effectiveness. Governors will review this policy every year and may amend and adopt it in accordance with any new legislation or guidance or in light of their quality assurance of the delivery of this policy and the overall safeguarding arrangements made.

In doing so neither the governing body as a whole nor individual governors have any role in dealing with individual child protection cases, except in the discharge of their functions in dealing with an allegation of abuse against the Head teacher. In cases of allegations against the Head teacher it will be the Chair of Governors, as the 'Child Protection' governor, who will carry out this statutory function; please see our 'Allegations Against Staff Policy'

In Bright Centre we also have a Trustee responsible for championing child protection and safeguarding issues within the Centre and on the trustee body. Please note this is not the role outlined the above paragraph. This Trustee will liaise with the Director on child protection and safeguarding matters and may submit reports to the governing body.

Emergencies

In emergency situations, where an ambulance (or other emergency service) is called, we will ensure that the correct address and post code is given so that navigation to the site is not hampered.

Additionally, we will always station a member of staff at the roadside entrance or gate to direct the emergency service personnel to the site of the emergency. We will ensure that the gate or access control system is open so as not to hinder access by the emergency services.

Training

Whole Centre in-service training will be organised for staff and Trustee at least every three years and will comply with the prevailing arrangements agreed by the Local Authority and Lambeth's Safeguarding Children Board and will be in line with the training groups outlined in 'Working Together to Safeguard Children 2010'. The Designated Safeguarding Lead will attend Lambeth training courses as necessary and the appropriate inter-agency training organised by organisations such as the Lambeth Safeguarding Children Board at least every two years. The Deputy Designated Safeguarding Lead will also be given the opportunity to attend these courses.

All staff will receive mandatory induction, as specified in Working Together 2021 Chapter 2 Section 4 Page 48, which will include familiarisation with our Child Protection and Safeguarding arrangements, the procedures to be followed in cases of concern as set out in this policy document and the name of our Designated Safeguarding Lead. As set out in Keeping Children Safe in Education staff will also receive a copy of the Staff Code of Conduct/Staff Behaviour Code

All staff will also be issued with a copy of the 12-page summary of Part One the Government guidance 'Keeping Children Safe in Education' and will sign to indicate that they have received it and have read the document.

Supply and other temporary staff will also be given the documents outlined in the preceding paragraphs, and other relevant policies, on arrival by Hamdi Aden Centre Manager.

Recruitment

The arrangements for recruiting all staff to our Centre will follow the DfE guidance for safer recruitment best practice in education settings, the prevailing staffing regulations, and guidance from the Disclosure & Barring Service (DBS). Bright Centre is a 'specified place' under the definition of Regulated Activity and therefore all those that work in our centre carries out work that is considered to be Regulated Activity. This means that all staff will be subject to stringent Safer Recruitment best practice including a range of conditions such as satisfactory references and an Enhanced Disclosure and Barring Service (DBS) check to include a Children's Barred List check. Volunteers will be subject an Enhanced DBS Check but without a Barred List Check as they will not work alone with children and be suitably supervised at all times; in line with current Government guidance.

A single central record (SCR) will be kept of all vetting checks, which will also include verification of the member of staff's identity, which will be via photographic means (Driving Licence, Passport ID card etc.). Also any relevant qualifications and permission to work in the UK for non-EU nationals. In Bright Centres we will ensure that DBS checks are renewed every three years for all staff, and will be a condition of service. This full renewal may be waived where the member of staff subscribes to the DBS Update Service and the status check is satisfactory and repeated three yearly.

All staff in Regulated Activity, including teaching and childcare/support staff, must by law be checked against the DBS's Children's Barred List prior to their appointment as part of the vetting process, and a separate DBS Children's List check will be made where a DBS Check has been applied for but not returned by the start date for all staff working unsupervised in regulated activity. Our centre will only use employment agencies that positively vet their supply staff and confirm in writing that DfE / DBS compliant checks have been carried out. Staff joining our centre on a permanent or temporary basis will be informed of the CP policy and the centre's Child Protection and Safeguarding arrangements as part of induction, as set out above.

Additionally, we will make arrangements to ensure that we do not knowingly employ any person in our Early Years Foundation Stage (0-5 year) or our After School activities (0-8) who have been disqualified from such work under the Childcare Act 2006 as set out in the Childcare (Disqualification) Regulations 2009. Only staff within our early year's teams, after school clubs and their direct line managers will be asked to make the relevant declarations.

The single central record (SCR) will include the status of these checks and date these checks were made and by whom.

Our Centre has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or if we have a reason to believe the member of staff has committed one of a number of listed offences and as a result we have removed them from working in Regulated Activity. Such referrals to the DBS equally apply to paid or unpaid staff where we are the employer and also applies where we would have removed that person from Regulated Activity had that person not resigned from our employment. For further information, please refer to STAFF CODE / STAFF BEHAVIOUR POLICY / EMPLOYMENT POLICY etc.]

Volunteers

In line with the guidance on safer recruitment from the DfE and the Disclosure & Barring Service (DBS), it is expected that all volunteers will be suitably supervised. Thus volunteers may be subject to an Enhanced DBS Check but without a check of the Children's Barred list, as supervised activity does not fall under the definition of Regulated Activity.

Therefore, all volunteers will work under the direct management of an established staff member, who is in Regulated Activity and vetted accordingly, and all volunteers will be subject to the same code of conduct as paid employees of our centre. Bright Centre will provide volunteers with appropriate induction and volunteers will have a 'job description' pertaining to the volunteering role they are to perform.

As noted above; all staff, including volunteers, will be inducted which will include the provision of centre's policies and procedures, this will include any temporary volunteering staff.

³ *Regulated Activity is work that a barred person must not do. Work is only considered to be Regulated Activity where it is carried out unsupervised at least once per week or more often, or on four or more days in a thirty-day period, or overnight.*

Physical Intervention and Safe Working Practice

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with pupils and their families. Children will be treated with respect and any rewards and sanctions should follow those detailed in our centre's Behaviour Management Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff should avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. As noted in our Use of Reasonable Force Policy, force may be used to control or restrain children. Restraint or positive handling should only be used as a last resort. Where incidents occur that might otherwise be misconstrued or where it becomes necessary to physically restrain or use force to control a child this may be done so for the following reasons;

for their own safety,
the safety of others, and/or
to prevent a criminal act or to maintain good order and discipline.

As per best practice advice such incidents will be recorded and reported to the Centre Manager and may be reported to parents as appropriate as per best practice advice. Our Use of Reasonable Force procedures are in line with prevailing DfE Guidance on the Use of Reasonable Force. Refer to our separate policy on positive handling / restraint and the reasonable use of force.

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Refer to our guidance on, One-to-One Working Safe Practice.

Centre staff should also be alert to the possible risks that might arise from contact with pupils outside of centre, including contact when using digital technologies which should be for centre purposes only and through centre equipment/numbers/digital addresses, not personal equipment / devices or personal numbers, e. mail addresses or other such sites. It is expected that staff will always decline requests from pupil to be 'friends' on social networking sites. The Head Teacher must always be made aware of any such contact or approach from pupils.

First Aid should only be administered by qualified first aiders including Paediatric First Aid trained staff and, if it is necessary for the child to remove clothing for this treatment, there should be, wherever possible, another adult present.

COVID-19 Safety

The Centre has undertaken a Health and Safety Risk Assessment, taking into account the Government's and Public Health England (PHE)'s latest guidance for Out Of School Settings (27/09/2021) . Please review our COVID-19 Risk Assessment and contingency plans for full information.

Changing for sport enrichment.

As our children get older, and at least from the age of 8 years onwards, they will be given the opportunity to change for sport. in our single sex areas.

Handling Complaints and/ Dealing with Allegations Against Staff

Complaints and Allegations are different, and are dealt with differently. Parents have the right to make a formal complaint against the action of the Centre and/or its employees and such complaints will be dealt with in line with Bright Centres's Complaints Procedures. However, where it is clear that the complaint fulfils the 'allegations test' the matter will be dealt with in line with the agreed Allegations Procedures and our complaints process will be suspended or even wholly replaced by the procedures for dealing with allegations against staff. These are set out our separate 'complaints procedure Against Staff' Policy.

Bright Centres takes all allegations made against members of staff seriously. Mechanisms are in place for pupils, parents/carers and staff to share any concerns that they might have about the actions of any member of our centre staff. All such allegations will be dealt with in line with agreed procedures for managing allegations against staff and in our centre must be brought immediately to the attention of the Director, **not** the Designated Safeguarding Lead (unless that is the same person) in order that the appropriate procedures may be followed.

All allegations will be dealt with in line with Part 4 of 'Keeping Children Safe in Education'.

Parents should also be advised of their independent right to make a formal complaint to the Police.

If the allegation concerns alleged abuse by the Director, this again should **not** be brought to the attention of the Designated Safeguarding Lead nor the nominated CP Champion Trustee Any allegation pertaining to the Director **must only** be brought to the attention of the Chair of trustee who will consult with Lambeth's Education Services Lead Officer or Lambeth Children's Social Care via the Local Authority Designated Officer (LADO).

Staff who are formally disciplined for any abuse of pupils (or who resign before disciplinary action can be instigated) will be notified to the Local Authority, if they are not already part of this process, and must be referred to the Disclosure and Barring Service, for their consideration of possible inclusion on their list of persons barred from working with children and young people.

Greater detail on the procedures for managing allegations against staff are to be found in our separate policy pertaining to this area as outlined above and the procedures set out in that policy should be followed in these circumstances

Records

Accurate written notes will be kept of all incidents or CP concerns relating to individual children. If a teacher or other staff have a child protection concern they should these will be kept on the pupil's Child Protection file.

Child Protection records are not available to pupils or parents due to the confidential nature of the content. Child Protection records are kept by the Designated Safeguarding Lead separately from educational/pupil records, and can only be accessed by the Designated Safeguarding Lead or their Deputy, or the Director. Other members of our Centre Senior Management Team may have access to certain information on a need to know basis, as appropriate.

Where a child moves from Bright Centre any Child Protection records or files will be forwarded to any receiving school within five days of that new provision being confirmed. The CP file will be sent separately to the pupil file.

Retention and Destruction

Current timescales for the retention of Child Protection Records are D.o.B. +35 years after which they should be destroyed.

The general Pupil Record / Files is to be retained for D.o.B. +25 years after which they should be destroyed.

Responsibility and Immediate Action

All adults working in Bright Centre (including visiting staff, volunteer's contractors, and students on placement) are required to report instances of actual or suspected child abuse or neglect as outlined above to the Designated Safeguarding Lead or Centre Director in Bright Centre our reporting arrangements are, as follows;

BRIGHT CENTRE INCIDENT / CONCERN REPORT

Entry No.:

Names of staff / pupils concerned: (incl. Year Gp)

Date of Incident
Or Concern:

Time of Incident
Or Concern:

Incident / Concern reported by:

Type of Incident / Concern:

Racial:

☐

Child Protection Concern:

☐

Attendance / Welfare:

☐

Bullying:

☐

Health Concerns:

☐

Behaviour/Discipline:

☒

Place of Incident / Concern:

Description of Incident / Concern: (incl. equipment, what was said & by whom)

BRIGHT CENTRE - REPORTING FORM (Cont.)

Entry No.:

Action taken and by whom:

Referral made to SS:

☐
☐

First Aid Given by First Aider:

☐
☐

Referral made to EWO:

Recorded in H&S Accident Book:

Referral made to another agency (Specify):

Signed/Initialled by Class teacher:

Signed/Initialled by SMT:

Other notes:

OFFICE USE ONLY

Electronic recording completed:

☐

Racial Incident Report Form sent:

☐

Copied to:

Parents with covering letter:

Yes

☐

No

☐

LEA if applicable (name dept):

Appendix 3: Example Risk Assessment / Management Form

Introduction:

Risk assessment and management is a vital component of Safeguarding as well as Health and Safety at Work requirements for all staff, employees and pupils in an educational setting. In the event of a serious incident arising from pupil behaviour, any reviewing body will pay close regard to the foreseeable risks and the approach taken to risk management in drawing its conclusions about whether reasonable action was taken by a school or individual staff member. This form is designed to be used in consultation with all agencies involved with young person, particularly social care, youth offending services and any specialist services involved. It can be used within a

When should this risk assessment be used?

This risk assessment should be used when:

An identified student has presented with challenging or dangerous behaviour of a child protection or safeguarding nature and may pose a risk to themselves or others by being

1. Subject of a Police Criminal Investigation or Child Protection investigation and/or
2. Subject of a risk assessment e.g. Youth Offending Service, specialist service (re e.g. violence) and an education safeguarding risk assessment and management plan will afford them and others protection.

This risk assessment can also be used when a student or students:

3. Has been subjecting others to bullying and/or
4. Has been victim of an incident of Child Protection/Safeguarding concern including bullying and this process will afford them protection and/or
5. Has made repeated, apparently unfounded allegations against staff and/or other students and/or
6. Is focusing sexually provocative behaviour towards other students and/or members of staff.
7. Has made threats of self-harm.

- As a result of behaviours exhibited in your educational setting
- Another LA from which the child has come
- A previous school or Early Years provider
- A Local Authority Children's Services department
- Youth Service
- Health Authority
- Police or Youth Offending Service
- A parent / carer of the student concerned
- A specialist services

What should you do with this risk assessment?

- Remember that this is a confidential document. It should be distributed on a 'Need to know' basis agreed at the meeting which will ensure staff and student safety is not compromised. Please seek further advice if you are in doubt about individual cases.
- Ensure that staff identified as needing to know the risks and management plan have a copy. (This may include a variety of non-teaching staff, such as office and site management staff).
- Ensure that the Parent/Carer of the student is involved, wherever appropriate, in its completion and has a copy.
- Ensure that there is a clear line of management associated with this document. By paying due regard to the details of risk presented by the student, additional strategies and staff should be deployed through an Individual Education Plan.
- The aim of assessment is to allow as full participation as possible by the student in school life, without prejudice to other members of the community.

Specify any SEN or issues of race, culture or diversity:

--

Date Completed:

Point of Assessment:	Prior to admission	<input type="checkbox"/> (Please tick)
	On admission	<input type="checkbox"/>
	At annual review/planning meeting	<input type="checkbox"/>
	Following one/series of critical incidents	<input type="checkbox"/>
	Details of any other agencies involved	<input type="checkbox"/>

Incident:

Summary of concerns - if relating to other young people care must be taken re confidentiality:

Case co-ordinator within education setting (if appropriate)

Name and designation:

..... Date:

Lead professional or allocated social worker: Date:

Decision re. Parent/Students Involvement - if not involved please specify why:

Agreed Action Points:

Parent/Carer's Name:

Signature: Date:

Pupil's Name:

Signature: Date:

Social Care/Education Representative Signature:

Date:

(To complete this sheet please refer to the Guidance notes in the appendix)

Types of Behaviour Causing Concern (Please select those applicable and known to have occurred and give examples - you may wish to change the types of behaviour to more accurately reflect the behaviour of the student)	✓	Frequency H = hourly D = daily W = weekly O = occasionally M = monthly	Intentionality D = deliberate A = accidental Or Incidental I = involuntary	Risk		
				Hazard (H) 1-4	Probability (P) 1-4	LEVEL OF RISK (H×P) 1-16 (add level descriptor)
Self Harm						
Bullying - Doing it						
Bullying - subject of it						
Swearing/ Abusive						
Sexually inappropriate behaviour						
Grooming behaviours e.g. befriending vulnerable pupils, being overly complaint to 'put staff on guard'						
Sexually provocative behaviour						
Inappropriate behaviour						
Violent/aggressive behaviour						
Substance/alcohol misuse						
Racial/Gender/Religious/Learning Disability discrimination						
Absconding/absenting						
Damage to property						
Offending behaviour (e.g. stealing)						
Carrying/using weaponry						
Reckless disregard for personal safety (e.g. running across busy roads)						
Other (<i>Please specify</i>)						

TRIGGER POINTS

Educational difficulties	<input type="checkbox"/>	Details:
Issues with certain staff	<input type="checkbox"/>	Details:
Issues with certain peers/groups	<input type="checkbox"/>	Details:
Control/authority issues	<input type="checkbox"/>	Details:
Gender/racial issues	<input type="checkbox"/>	Details:
Frustration with self	<input type="checkbox"/>	Details:

Additional Details: The accompanying Behaviour Management Plan should explain the circumstances where adult intervention will be used (because the risks associated with it are judged to be less than if no intervention was used). If it does not, please indicate here:

LOCATIONS OF VULNERABILITY

Tick all that apply:

Classroom/teaching areas	<input type="checkbox"/>
In corridors/between lessons	<input type="checkbox"/>
In Centre toilets	<input type="checkbox"/>
Practical lessons	<input type="checkbox"/>
P.E.	<input type="checkbox"/>
Unstructured times (Playtimes)	<input type="checkbox"/>
At mealtimes/dinner hall	<input type="checkbox"/>
Social time before/after centre activities	<input type="checkbox"/>
Centre transport (taxi)	<input type="checkbox"/>
Minibus/School trips	<input type="checkbox"/>
Behaviour when medication not taken	<input type="checkbox"/>
At home	<input type="checkbox"/>
In community	<input type="checkbox"/>
List any Orders	<input type="checkbox"/>

Additional details: (include any environmental conditions such as large groups and noise levels)

ADDITIONAL CONTROL MEASURES REQUIRED TO REDUCE RISK

<input type="checkbox"/>	Additional staff experienced in issues of Emotional Behaviour and Social difficulties. (*)
<input type="checkbox"/>	Specific timetable modification or curriculum disapplication. (*)
<input type="checkbox"/>	Specific/named senior staff as persons called for/student sent to in emerging crisis. (*)
<input type="checkbox"/>	Behaviour Management Plan (BMP) or existing Individual Education Plan/Pastoral Support Plan. (*)
<input type="checkbox"/>	BMP with Positive Handling Strategies (Restrictive Physical Intervention) (*)
<input type="checkbox"/>	Specific equipment/resources made available to student or staff.
<input type="checkbox"/>	Identified location(s) for calming down or 'Timeout'.
<input type="checkbox"/>	Additional staff to support specific curriculum issues.
<input type="checkbox"/>	Staff not to be alone with student.
<input type="checkbox"/>	Supervised during unstructured times/playtimes/school arrival & departure specify level e.g. 1:1 at all times.
<input type="checkbox"/>	Parental support on hand/attendance at the centre.
<input type="checkbox"/>	Local Authority Social Care Dept. providing support.
<input type="checkbox"/>	Local Police informed.
<input type="checkbox"/>	Modification or restriction of school visits or work placements
<input type="checkbox"/>	Increase of personal tutorials.
<input type="checkbox"/>	Change of tutor group/subject set groups.
<input type="checkbox"/>	Escorts in centre transport/taxis
<input type="checkbox"/>	Additional training required for staff

(*) Please ensure that all necessary information is kept with this document, and available to relevant staff and parent/carer.

APPENDIX GUIDANCE NOTES ON SOME CHARACTERISTICS ASSOCIATED WITH CATEGORIES

Matrix: Hazard × Probability = Level of Risk

Seek views of e.g. Headteacher, Service manager, Designated Child Protection Officer

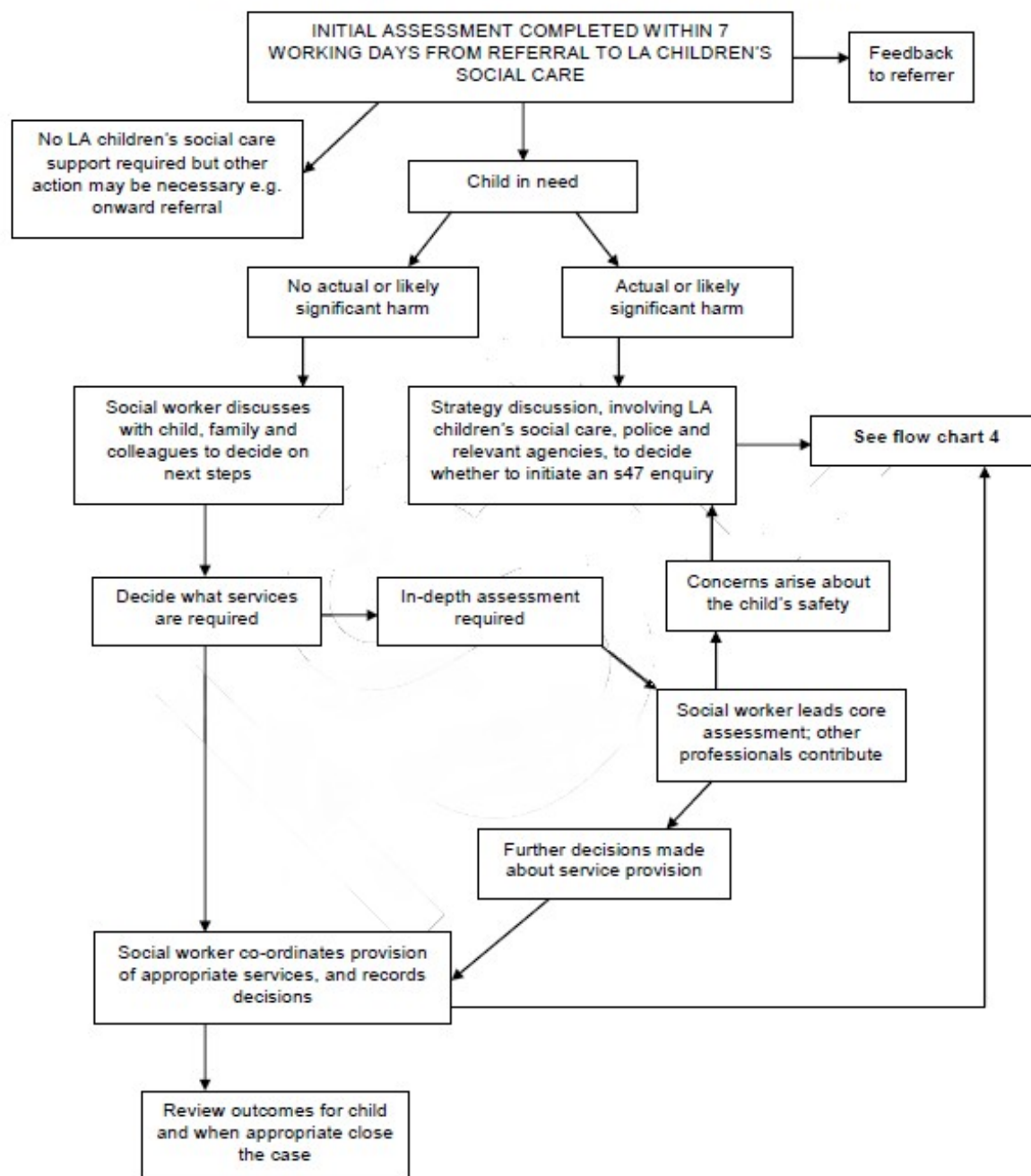
HAZARD Level of Harm Presented	PROBABILITY	LEVEL OF RISK (Hazard × Probability)
<p><u>LOW = 1</u></p> <ul style="list-style-type: none"> Causes occasional and minor disruption Little or no additional staff deployed. Causes some offence with some staff, e.g. swears as walking away/mutters under breath No harm to others. 	<p><u>LOW = 1</u></p> <ul style="list-style-type: none"> Could happen in occasional circumstances e.g. when confronted insensitively or by adults not known to the pupil. Taking part in a highly structured activity Triggered by specific well known factors that can be planned for. 	<p><u>LOW: 1 - 4</u></p> <ul style="list-style-type: none"> Acceptable range of behaviour <u>given</u> age, maturity, emotional difficulty and personal circumstances. Occasional incidents of non-compliance/challenge associated with mood swings. Potential health and safety risk to other staff and pupils.
<p><u>MODERATE = 2</u></p> <ul style="list-style-type: none"> Occasional harm to others/ self or damage to property. Distress caused is more widespread. Offends with language, makes sexualised comments or actions, use of subtle coercion or lower level grooming behaviours, but still biddable. Extra resources/staff can often stabilise situation 	<p><u>MODERATE = 2</u></p> <ul style="list-style-type: none"> May happen with some regularity with known triggers. Documented patterns of antecedent and behaviours emerging. Will respond to staff at higher levels of authority or key worker and is able to discuss issues. 	<p><u>MODERATE: 5 - 8</u></p> <ul style="list-style-type: none"> Commonplace incidents of non-compliance/challenge including dangerous behaviour associated with impulsiveness, a lack of anticipation and acceptance of consequentiality. Absenting or absconding. Ignoring adult advice and guidance. Student will usually respond to Positive Handling Strategies. Behaviour goes into remission quickly. Regular incidents of non-compliance/challenge including aggressive confrontations with others. Will avoid adult supervision if possible. Reduce hazards where possible. Pupil considered for appropriateness of certain lessons/locations.

<p><u>SUBSTANTIAL = 3</u></p> <ul style="list-style-type: none"> • Frequent damage with necessary costs of replacement. • Personal safety of student/others is compromised. • Needing supervision and special arrangements. • Implications for people/property beyond school grounds. • Offensive and disruptive to a wide section of the community. • Use of coercion or threat • More obvious pattern of grooming behaviours • An allegation by other young person or staff member. 	<p><u>SUBSTANTIAL = 3 Very likely to happen)</u></p> <ul style="list-style-type: none"> • Child does not show acceptance of authority hierarchy. • Does not acknowledge that their behaviour is unacceptable • Pupil may have become disaffected and disenfranchised. • Most adults are unable to affect a positive intervention. • Ongoing self harm 	<p><u>SUBSTANTIAL: 9 - 12</u></p> <ul style="list-style-type: none"> • Numerous incidents of non-compliance and severe challenge including violence and aggression associated with a loss of emotional control. • Regular absenting from class necessitating monitoring. NIB absence may enable the young person to plan or pursue unacceptable abusive behaviour away from adult supervision. • Undermining of adult authority to present challenge to the security of the structured environment, sustained over time. • Will react negatively to Positive Handling Strategies but remission is forthcoming. • Careful staff allocation needed to reduce likelihood and effects of behaviour. • Work routines of student and peers needs careful planning. • Any allegation must be reported to Social Care.
<p><u>HIGH = 4</u></p> <ul style="list-style-type: none"> • Significant injury to others/self. • Traumatic effect on peers/adults. • Damage levels and replacement costs in excess of £250.00 • Abuse of others • Targeting young people for exploitation • Abuse by self or others • Evidence that the young person successfully is, or has, groomed the adults and young person. (NIB can be by use of text or internet. 	<p><u>HIGH = 4 (Established Pattern of previous or ongoing occurrence</u></p> <ul style="list-style-type: none"> • Expert management by groups of staff usually fail to remediate the situation. • Pupil self control is virtually non-existent. • Volatile and over-sensitised to school environment such that triggers are frequent and globally located around the establishment. • Threats of suicide 	<p><u>HIGH: 16</u></p> <ul style="list-style-type: none"> • Numerous incidents of non-compliance and severe challenge including dangerous, violent and aggressive behaviour. • Characterised by bullying and/or assault with premeditation. • Undermining adult authority to the detriment of the security of the structures environment and the safety and welfare of other students/adults. • Reacts badly to RPI strategies. • Police need to be notified frequently or parental attendance as soon as possible. • Immediate continuing action needed. Specialist plans being carried out by designated staff on a daily basis. Further advice needed. Outside support agencies available at short notice. Referrals to the GP and social care must be made for any threat of suicide. The Maple Service can be contacted for urgent assessment. • Referrals to social care must be made for any allegation of abuse. The discussion with Social Care will agree action including when and whether the parent/carer can be told

Appendix Six: Flow Charts

FLOW CHARTS 1 - Referral

FLOW CHART 2 – WHAT HAPPENS FOLLOWING INITIAL ASSESSMENT?



Policy Adoption, Monitoring and Review

This policy was considered and adopted by the Governing body in line with their overall duty to safeguard and promote the welfare of children as set out in the DfE guidance 'Keeping Children Safe in Education'

Parents will be issued with a hard copy of this policy on request. This policy will also be made available to parents via Centre website.

In Bright Centres the Director will actively evaluate the effectiveness of this policy by monitoring the staff group's understanding and application of the procedures within this policy as their overall duty to safeguard children. This may include monitoring the appropriateness of cases referred internally to the Designated Senior Lead Person for Child Protection and whether those cases referred to Lambeth Social Care met their threshold and were taken forward.

Policy Last Reviewed on: October 2021

Policy Due for Review on: October 2022