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APPENDIX 1
SAFEGUARDING REPORTING

A member of staff becomes concerned about:

- A student's welfare;
- A disclosure made by a student;
- A safeguarding incident;
- A report from another person;
- Behaviour indicating possible abuse, neglect or exploitation.

↓

The member of staff must:

- Report immediately to the DSL or Deputy DSL;
- Record factual information on CPOMS
- Avoid investigating the concern.

The DSL will:

- Review information;
- Consider previous concerns;
- Assess risk;
- Determine next steps.

The DSL may:

- Monitor internally;
- Provide support;
- Initiate Early Help;
- Undertake a risk assessment;
- Refer to Children's Social Care;
- Refer to Adult Social Care;
- Refer to Police;
- Refer to other agencies.

The concern remains under review until closure.

APPENDIX 2
DSL DECISION-MAKING FLOWCHART

Concern Received

↓

Is there immediate risk of harm?

YES

→ Emergency services / Police / Social Care

NO

↓

Does the concern meet safeguarding threshold?

YES

↓

DSL assessment

↓

Referral / intervention

NO

↓

Early Help / Student Support / Monitoring

↓

Review

APPENDIX 3
STUDENT SUITABILITY, SAFETY AND CRIMINAL RISK MANAGEMENT PROCEDURE

PURPOSE

To ensure safeguarding risks associated with criminal behaviour or serious concerns are managed consistently and proportionately.

It provides a framework for Designated Safeguarding Leads (DSLs) when assessing safeguarding risks arising from:

- Unspent criminal convictions;
- Police investigations;
- Serious safeguarding concerns;
- Violence;
- Sexual misconduct;
- Child-on-child abuse;
- Criminal exploitation;
- County lines activity;
- Radicalisation concerns;
- Serious youth violence;
- Other behaviours which may present a risk to students, staff, visitors or the wider Academy community.

The purpose of this process is to protect the welfare of all students whilst ensuring decisions are fair, proportionate, evidence-based and safeguarding-led

SAFEGUARDING PRINCIPLES

When undertaking any assessment, the DSL must consider:

- The welfare of children as paramount.
- Proportionality.
- Individual circumstances.
- Equality and non-discrimination.
- Contextual safeguarding factors.
- Multi-agency information.

- Student voice.
- Natural justice and fairness.

Risk assessments are safeguarding tools and are not disciplinary investigations.

INFORMATION GATHERING

The DSL should gather information from appropriate sources including:

Internal Sources

- Student records;
- Attendance data;
- Behaviour records;
- Previous safeguarding concerns;
- Risk assessments;
- Staff reports;
- Welfare records

External Sources

Where appropriate:

- Police;
- Children's Social Care;
- Adult Social Care;
- Youth Offending Services;
- Probation Services;
- Violence Reduction Units;
- Mental Health Services;
- Other relevant safeguarding agencies.

RISK FACTORS NAD LEVELS TO CONSIDER

The DSL should consider:

Nature of the Concern

- What happened?
- When did it occur?
- Is the concern ongoing?
- Has the behaviour escalated?

Risk to Self Consider: • Self-harm; • Suicidal ideation; • Vulnerability to exploitation; • Substance misuse; • Mental health concerns.	**Risk to Other Students** Consider: • Physical safety; • Emotional wellbeing; • Sexual safety; • Vulnerable students; • Group dynamics.	**Risk to Staff** Consider: • Safety; • Professional boundaries; • Intimidation; • Harassment	**Risk to Visitors and Contractors** Consider: • Public safety; • Under-16 visitors; • BCIS participants; • External organisations using Academy premises.	**Contextual Risks** Consider: • Peer groups; • Community influences; • Online activity; • County lines concerns; • Serious youth violence; • Gang affililation

LOW RISK Characteristics may include: • Historic concerns; • No current indicators of risk; • Positive engagement; • Strong protective factors.	**MEDIUM RISK** Characteristics may include: • Emerging concerns; • Some ongoing vulnerability; • Increased monitoring required.	**HIGH RISK** Characteristics may include: • Significant safeguarding concerns; • Serious allegations; • Active criminal investigations; • Risks to others.	**UNACCEPTABLE RISK** Characteristics may include: • Immediate safety concerns; • Serious and unmanaged risks; • Inability to mitigate risk through reasonable safeguards.
Typical Outcome • Continue attendance; • Routine monitoring; • Pastoral support.	Typical Outcome • Attendance with safeguards; • Additional support; • Risk review meetings	Typical Outcome • Enhanced safeguarding controls; • Multi-agency involvement; • Formal safeguarding plan; • Consideration of temporary remote education.	Typical Outcome • Escalation to senior leaders; • Immediate safeguarding action; • Multi-agency intervention; • Legal advice where appropriate.

DSL ACTIONS

The DSL will:

1. Gather information.
2. Assess safeguarding risks.
3. Consult agencies where appropriate.
4. Determine interim safeguarding measures.
5. Review regularly.

The rationale for decisions must be clear, evidence-based and capable of external scrutiny.

POSSIBLE OUTCOMES

- No further action.
- Safeguarding support.
- Enhanced monitoring.
- Temporary remote education.
- Referral to external agencies.

POSSIBLE INTERIM SAFEGUARDING MEASURES

Pending completion of assessment, the Academy may implement:

- Temporary remote education;
- Supervised attendance;
- Restricted movement arrangements;
- Alternative timetables;
- Separate break arrangements;
- Increased pastoral support;
- Enhanced monitoring.

These measures are safeguarding controls and not disciplinary sanctions.

TEMPORARY REMOTE EDUCATION

Temporary remote education may be considered where:

- Risk assessment is ongoing;
- Information from external agencies is awaited;
- Immediate risks require management;
- Safeguarding arrangements cannot yet be safely implemented onsite.

The decision must:

- Be proportionate;
- Be documented;
- Be reviewed regularly;
- Include a planned review date.

REVIEW PERIODS

Risk assessments should be reviewed:

High Risk

At least every 10 working days.

Medium Risk

At least every 20 working days.

Low Risk

At least termly.

Additional reviews should occur whenever:

- Circumstances change;
- New information is received;
- Agency involvement changes.

QUALITY ASSURANCE

The DSL should ensure that:

- Assessments are reviewed;
- Decisions are proportionate;
- Records are complete;
- Safeguarding measures remain appropriate.

The Governing Body will receive anonymised assurance regarding the operation of this framework through safeguarding reporting arrangements.

APPEALS AND REPRESENTATIONS

Students may provide information which they believe is relevant to the assessment process.

The Academy will consider all relevant information before final decisions are made.

Safeguarding decisions remain the responsibility of the Academy.

APPENDIX 4

CRIMINAL CONVICTION DISCLOSURE PROCEDURE

STUDENT REQUIREMENT

Students must disclose any unspent criminal conviction:

- At enrolment;
- During study;
- If circumstances change.

LEGAL POSITION

BCA does not routinely request or process information relating to spent convictions except where legally permitted.

Students must inform BCA where they are subject to a current legal restriction, court order, bail condition, licence condition, restraining order, safeguarding plan or other formal condition which may:

- Affect their attendance at the Academy;
- Restrict their contact with another student, member of staff or other individual;
- Restrict their access to particular locations or activities;
- Affect participation in work experience, industry placements, trips or off-site activities; or
- Otherwise have implications for the safety or safeguarding of the student or others within the Academy community.

The purpose of this requirement is to enable the Academy to comply with current legal restrictions and manage identified safeguarding risks. It does not require a student to disclose a spent conviction or caution where the Academy is not legally entitled to request that information.

FAILURE TO DISCLOSE

Failure to disclose may result in:

- DSL investigation;
- Safeguarding assessment;
- Temporary safeguarding measures;
- Disciplinary action.

SAFEGUARDING ASSESSMENT

Where an unspent criminal conviction is disclosed, the DSL should consider:

Nature of the Offence

- Violence;
- Weapons;
- Sexual offences;
- Exploitation;
- Drug offences;
- Hate crime;
- Public order offences.

Circumstances

- Age at time of offence;
- Frequency;
- Pattern of behaviour;
- Mitigating circumstances.

Current Risk

- Evidence of rehabilitation;
- Compliance with external agencies;
- Current behaviour;
- Ongoing investigations.

Impact on Academy Community

- Risk to students;
- Risk to staff;
- Risk to visitors;
- Reputational considerations.

DSL ACTIONS

The DSL will:

1. Gather information.
2. Assess safeguarding risks.
3. Consult agencies where appropriate.
4. Determine interim safeguarding measures.

5. Review regularly.

The rationale for decisions must be clear, evidence-based and capable of external scrutiny.

POSSIBLE OUTCOMES

- No further action.
- Safeguarding support. (see Appendix 3)
- Enhanced monitoring.
- Temporary remote education. . (see Appendix 3)
- Referral to external agencies.

APPENDIX 5
CATEGORIES OF ABUSE

BCA recognises the following categories of abuse:

Physical Abuse
Deliberate physical harm.

Emotional Abuse
Persistent emotional maltreatment.

Sexual Abuse
Forcing or enticing a child or vulnerable person to participate in sexual activities.

Neglect
Persistent failure to meet basic needs.

APPENDIX 6

CHILD-ON-CHILD ABUSE FRAMEWORK AND HARMFUL SEXUAL BEHAVIOUR

Child-on-child abuse may include:

- Bullying;
- Cyberbullying;
- Physical abuse;
- Sexual violence;
- Sexual harassment;
- Harmful sexual behaviour;
- Image-based abuse;
- Initiation activities.

BCA operates a zero-tolerance approach..

OUR APPROACH

Big Creative Academy recognises that children can abuse other children and that child-on-child abuse can occur inside or outside the Academy and online.

All child-on-child abuse is unacceptable and will be taken seriously. Staff must maintain an attitude of **"it could happen here"** and must not dismiss harmful behaviour as "banter", "having a laugh", "part of growing up" or similar.

The Academy will respond in a child-centred, proportionate and safeguarding-led way, considering both the **risk presented and the needs of all students involved**.

HARMFUL SEXUAL BEHAVIOUR

Harmful sexual behaviour is an umbrella term for sexual behaviours displayed by children and young people that are developmentally inappropriate, problematic, abusive or violent.

Sexual behaviour exists on a continuum. When considering behaviour, the DSL will take account of:

- Age and developmental stage;
- The nature, frequency and severity of the behaviour;
- Consent;
- Power imbalance;
- Coercion, force or threats;

- Whether behaviour is escalating or repeated;
- SEND and communication needs;
- Trauma and other vulnerabilities;
- The relationship between the students;
- Online or technology-assisted elements; and
- The impact upon the students involved.

Chronological age alone will not determine a student's developmental understanding or capacity.

Patterns of sexualised, misogynistic, coercive or boundary-crossing behaviour will be considered cumulatively and not simply as isolated incidents.

REPORTING CONCERNS

Any member of staff who becomes aware of child-on-child abuse, sexual harassment, sexual violence or potentially harmful sexual behaviour must report the concern to the DSL or Deputy DSL without delay.

Staff should:

- Listen carefully;
- Reassure the student that they have done the right thing by reporting;
- Make an accurate factual record;
- Avoid leading or unnecessary questions; and
- Report the concern promptly.

Staff must not investigate, attempt to determine whether an allegation is true, mediate between the students or promise confidentiality.

Where there is an immediate risk of harm, appropriate emergency safeguarding action will be taken.

DSL ASSESSMENT AND RESPONSE

The DSL will consider each report individually and determine the appropriate safeguarding response.

Assessment will consider:

Risk: What risk exists to the student who experienced the behaviour, the student alleged to have caused harm, other students or the wider Academy community?

Need: What safeguarding, welfare, educational or specialist support does each student require?

The DSL will consider the wishes of the student who has experienced harm, while recognising that safeguarding action may still be required even where a student does not wish further action to be taken.

Depending on the circumstances, the DSL may:

- Manage the concern through Academy safeguarding arrangements;
- Put additional support or safety measures in place;
- Undertake a formal risk assessment;
- Seek Early Help;
- Consult or refer to Children's Social Care;
- Contact the Police;
- Seek specialist HSB advice or assessment; and/or
- Work with other relevant safeguarding partners.

The Academy will not automatically manage harmful sexual behaviour internally where specialist or statutory intervention is required.

RISK ASSESSMENT AND MANAGEMENT PLAN (RAMP)

Where child-on-child abuse or harmful sexual behaviour presents an ongoing or potentially significant safeguarding risk, the DSL will consider implementing a formal **Risk Assessment and Management Plan (RAMP)**.

The RAMP will consider:

- The nature and context of the behaviour;
- Risks to all students involved;
- Risks to other students;
- Known vulnerabilities and protective factors;
- Locations, times or circumstances in which risk may increase;
- Online risks;

- Work placements, trips and off-site activities where relevant; and
- Measures required to manage identified risk.

Safeguarding measures may include increased supervision, timetable or classroom adjustments, managed contact arrangements, safe spaces, changes to unstructured times, pastoral support, online safety measures or other proportionate controls.

The aim is to enable students to continue accessing education safely wherever reasonably possible.

The RAMP will be reviewed when circumstances change, new information becomes available or at intervals determined by the DSL.

AIM / SPECIALIST HARMFUL SEXUAL BEHAVIOUR ASSESSMENT

The Academy recognises that some harmful sexual behaviour requires specialist assessment.

Where behaviour is serious, complex, persistent, escalating or otherwise indicates the need for specialist assessment, the DSL will consider referral to an appropriate HSB service or safeguarding partner.

This may include consideration of an **AIM/AIM3 assessment or other recognised specialist HSB assessment framework**, where appropriate to the student's age, developmental needs and circumstances.

Specialist assessments must be undertaken by appropriately trained and competent practitioners.

The Academy's RAMP is an **education safeguarding and risk-management document and is not an AIM/AIM3 assessment**.

Where a specialist assessment has been completed, relevant findings and recommendations may, where lawfully shared, inform the Academy's safeguarding and risk-management plan.

A specialist assessment does not replace the Academy's responsibility to take immediate safeguarding action where required.

SUPPORTING STUDENTS

The Academy will consider the safeguarding and welfare needs of **all students involved**.

Student who has experienced harm

Support may include:

- A trusted adult;
- Safety planning;
- Pastoral or therapeutic support;
- Adjustments to educational arrangements;
- Support with attendance;
- Online safety support; and
- Referral to specialist services.

The student who has experienced harm should not be made responsible for managing the risk presented by another student.

Student alleged to have caused harm

The Academy recognises that a student displaying harmful behaviour may themselves have safeguarding, developmental or welfare needs.

Consideration will be given to factors including trauma, abuse, exploitation, SEND, mental health, family circumstances, exposure to pornography or harmful content, understanding of consent and relationships, and other vulnerabilities.

Supporting a student who has displayed harmful behaviour does not minimise the seriousness or impact of the behaviour or the Academy's responsibility to protect others.

The Academy will avoid unnecessarily stigmatising or labelling children and young people.

SEND AND ADDITIONAL NEEDS

SEND and developmental needs will be considered throughout assessment and safeguarding planning.

The Academy will consider:

- Developmental rather than solely chronological age;
- Communication needs;
- Understanding of consent and boundaries;
- Cognitive and social understanding;

- Trauma;
- Capacity to understand consequences; and
- Appropriate reasonable adjustments.

SEND will never be used to dismiss or minimise harmful behaviour.

ONLINE AND TECHNOLOGY-ASSISTED HARM

Child-on-child abuse and HSB may occur wholly or partly online.

This may include:

- Non-consensual sharing of sexual images;
- Pressure to create or send sexual content;
- Sexualised messaging;
- Online sexual harassment;
- Threats to distribute images;
- Grooming or coercion;
- Manipulated or AI-generated sexual imagery; and
- Exposure of another student to unwanted sexual material.

The DSL will consider the relationship between online and offline risks when assessing the concern.

MULTI-AGENCY WORKING

The Academy will work with safeguarding partners where appropriate.

This may include:

- Children's Social Care;
- Police;
- Youth Justice Services;
- Health or mental health services;
- Specialist harmful sexual behaviour services; and
- Other relevant agencies.

Where a Police or statutory safeguarding investigation is underway, BCA will continue to manage educational safeguarding risk while avoiding action that could prejudice an external investigation.

RECORDING AND REVIEW

The DSL will maintain appropriate records of concerns, assessments, decisions, referrals, risk-management arrangements, support and outcomes.

Records should clearly distinguish between:

- Reported information or allegations;
- Established facts;
- Professional judgement;
- Information received from other agencies; and
- Decisions and the rationale for those decisions.

Risk and safety plans will be reviewed when new information is received, circumstances change or safeguarding needs require it.

Staff will challenge inappropriate sexualised behaviour and language and will not normalise conduct that may contribute to an unsafe culture.

Students will be encouraged to report concerns and should be confident that they will be listened to and taken seriously.

KEY PRINCIPLE

When responding to child-on-child abuse or harmful sexual behaviour, BCA will consider:

What happened?

Who may be at risk?

What does each student need?

What immediate safeguarding action is required?

Is a RAMP required?

Is multi-agency or specialist HSB assessment required?

The purpose of the Academy's response is to safeguard students, address harmful behaviour, prevent escalation and enable students to continue accessing education safely wherever possible.

APPENDIX 7
ONLINE SAFETY FRAMEWORK

ACADEMY RESPONSIBILITIES

BCA will:

- Maintain filtering systems;
- Maintain monitoring systems;
- Deliver online safety education;
- Review emerging risks.

STUDENT EDUCATION

Students will receive education regarding:

- Online relationships;
- Online exploitation;
- Cyberbullying;
- Privacy;
- Misinformation;
- Reporting concerns.

Please refer to the Online Safety Policy.

We ask all student to also sign the Acceptable Use Policy / Agreement which clearly outlines expectations around safe use of the internet and BCA equipment.

APPENDIX 8
PREVENT DUTY FRAMEWORK

PURPOSE

Big Creative Academy recognises its statutory duty under section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

Prevent is part of BCA's wider safeguarding responsibilities. The Academy will take a proportionate and risk-based approach to identifying and supporting students who may be susceptible to radicalisation.

Prevent concerns will be managed through BCA's established safeguarding procedures.

BCA'S RESPONSIBILITIES

BCA will:

- Maintain an appropriate Prevent risk assessment and action plan;
- Consider local, regional and national risks;
- Ensure staff understand how to recognise and report concerns;
- Provide appropriate Prevent training;
- Maintain effective links with safeguarding and Prevent partners;
- Assess and refer concerns appropriately;
- Address online radicalisation through online safety arrangements;
- Manage risks associated with external speakers, events and use of premises;
- Promote fundamental British values; and
- Monitor and review the effectiveness of its Prevent arrangements.

RECOGNISING RADICALISATION

Radicalisation is the process through which a person comes to legitimise support for, or the use of, terrorist violence.

There is no single profile of a person susceptible to radicalisation and no definitive checklist of indicators.

Students may encounter radicalising influences online, through peers, family or community networks, extremist individuals or organisations, propaganda, misinformation or other influences.

Possible concerns may include:

- Expressing support for terrorist violence or terrorist organisations;
- Justifying or glorifying terrorist acts;
- Accessing, possessing or sharing terrorist or extremist material;
- Increasing intolerance or dehumanisation of others;
- Fixation on extremist narratives;
- Attempts to recruit or influence others;
- Concerning changes in online activity or peer groups; or
- Behaviour suggesting increasing susceptibility to radicalising influences.

Staff must avoid assumptions based upon religion, ethnicity, culture, nationality, political views or other protected characteristics.

Holding strong, controversial or unpopular views does not, by itself, indicate radicalisation.

REPORTING AND ASSESSING CONCERNS

Any member of staff concerned that a student may be susceptible to radicalisation must report the concern to the DSL or Deputy DSL without delay.

Staff should:

NOTICE – recognise behaviour or information that causes concern;

CHECK – consider the context and discuss the concern with the DSL; and

SHARE – enable appropriate safeguarding information to be shared where required.

Staff should not investigate concerns themselves.

The DSL will assess the concern in context, considering:

- The behaviour or information reported;
- The student's circumstances and vulnerabilities;
- Online and offline influences;

- Evidence of extremist or terrorist ideology;
- Evidence of susceptibility, intent or escalation;
- Protective factors; and
- Whether safeguarding support, specialist advice or referral is required.

Where there is an immediate threat to life or risk of serious harm, the Police will be contacted immediately.

REFERRAL AND CHANNEL

Where appropriate, the DSL will seek advice from or make a referral to the relevant Prevent team, Police, Children's Social Care or other safeguarding partners.

A Prevent referral is a safeguarding referral and does not mean that a student has committed a criminal offence.

Where a student is considered susceptible to radicalisation, they may be considered for **Channel**, the statutory multi-agency programme providing support to people at risk of being drawn into terrorism.

BCA will cooperate with Channel and other multi-agency safeguarding arrangements, share relevant information lawfully and continue to provide appropriate educational and pastoral support.

Where Prevent or Channel is not appropriate, the Academy will consider whether the student requires other safeguarding, Early Help, social care, mental health or pastoral support.

PREVENT RISK ASSESSMENT

BCA will maintain and regularly review a documented Prevent risk assessment and associated actions.

The assessment will take account of:

- Local, regional and national threats;
- BCA's student population and context;
- Online radicalisation;
- Curriculum and learning;

- External speakers, visitors and events;
- Premises use;
- Work placements and off-site learning;
- Staff training and awareness;
- IT filtering and monitoring;
- Referral arrangements; and
- Emerging risks or incidents.

Controls will be proportionate to the risks identified.

ONLINE SAFETY AND PREVENTATIVE EDUCATION

BCA recognises the significant role that online environments can play in radicalisation.

Prevent will therefore form part of the Academy's online safety, filtering and monitoring arrangements.

Students will be supported to develop critical thinking and media literacy and to recognise misinformation, manipulation, extremist propaganda and online recruitment techniques.

BCA will actively promote the fundamental British values of:

- Democracy;
- The rule of law;
- Individual liberty; and
- Mutual respect and tolerance of those with different faiths and beliefs.

Students will be provided with appropriate opportunities to explore different perspectives, challenge prejudice and discrimination and discuss controversial issues safely.

Prevent will not be used to restrict legitimate debate, lawful political discussion or the expression of lawful beliefs.

EXTERNAL SPEAKERS, EVENTS AND PREMISES

BCA will take proportionate steps to manage Prevent and safeguarding risks associated with external speakers, visitors, events and organisations using Academy premises.

Appropriate checks and risk assessments will be undertaken where necessary.

BCA will balance its safeguarding and Prevent responsibilities with its legal duties concerning freedom of speech.

Where identified risks cannot be appropriately mitigated, BCA may place conditions upon, modify or cancel an activity.

This section should be read alongside BCA's Visitors and Premises Hire/BCIS safeguarding arrangements.

STAFF TRAINING

Relevant staff will receive Prevent training appropriate to their role so that they understand:

- Prevent as part of safeguarding;
- Possible indicators of radicalisation;
- Online radicalisation;
- How and when to report concerns; and
- The Prevent referral and Channel process.

DSLs and safeguarding staff will have sufficient additional knowledge and training to assess concerns, seek advice and make appropriate referrals.

RECORDING AND INFORMATION SHARING

Prevent concerns, assessments, decisions, referrals and outcomes will be appropriately recorded.

Records should include the concern, information considered, professional judgement, advice obtained, decisions and rationale, referrals and actions taken.

Information will be shared where necessary, proportionate and lawful for safeguarding and Prevent purposes.

GOVERNANCE AND REVIEW

The Governing Body will ensure that BCA meets its statutory Prevent responsibilities and that Prevent is embedded within the Academy's safeguarding arrangements.

Leaders and governors will maintain appropriate oversight of:

- The Prevent risk assessment and action plan;
- Staff training;
- Referral arrangements;
- Online safety;
- External speakers and events; and
- Emerging risks and identified actions.

The framework and risk assessment will be reviewed regularly and following significant changes in statutory guidance, threat, local context or Academy circumstances.

APPENDIX 9

CHILDREN UNDER 16 ON SITE FRAMEWORK

Children under 16 may attend BCA through:

- School visits;
- Workshops;
- Outreach programmes;
- BCIS activities;
- Premises hire arrangements.

Requirements

- Risk assessment completed.
- Supervision arrangements agreed.
- Safeguarding contacts identified.
- Visitor procedures followed.

All safeguarding concerns must be reported immediately.

APPENDIX 10

PREMISES HIRE AND BCIS SAFEGUARDING REQUIREMENTS

Organisations using Academy premises must:

- Have safeguarding arrangements in place.
- Provide suitable supervision.
- Report safeguarding concerns immediately.
- Comply with Academy safeguarding expectations.

BCA reserves the right to refuse or terminate use of premises where safeguarding standards are not met.

APPENDIX 11

USEFUL CONTACTS AND REFERRAL PATHWAYS

Internal Contacts

Designated Safeguarding Lead

Deputy DSLs

Principal

Safeguarding Governor

External Contacts

Police

Children's Social Care

Adult Social Care

Local Safeguarding Partnership

Prevent Team

Local Authority Designated Officer (LADO)

Emergency Services

APPENDIX 12
CHILDREN AND YOUNG PEOPLE QUESTIONING THEIR GENDER

PURPOSE

Big Creative Academy is committed to safeguarding and promoting the welfare, dignity and wellbeing of all students.

Questioning gender is not, in itself, a safeguarding concern. However, some students questioning their gender may experience additional vulnerabilities, including bullying, harassment, discrimination, social isolation, mental health or psychosocial difficulties, family difficulties or other safeguarding concerns.

BCA will respond sensitively and individually, taking account of the student's age, maturity, circumstances, wishes and wider safeguarding and welfare needs.

This appendix should be read alongside the Academy's safeguarding, anti-bullying, equality, behaviour and online safety arrangements and current statutory guidance.

SAFEGUARDING APPROACH

Staff should:

- Listen to the student without judgement or assumptions;
- Take any safeguarding, bullying, harassment or mental health concerns seriously;
- Avoid attempting to diagnose or provide clinical advice;
- Consider whether there are wider safeguarding or welfare needs;
- Seek advice from the DSL where appropriate; and
- Record and report safeguarding concerns in accordance with BCA procedures.

Where a student may be at risk of significant harm, normal child protection procedures apply.

The DSL should consider the student's circumstances as a whole, including where relevant:

- Age and maturity;
- Wishes and views;
- Mental health and psychosocial needs;
- SEND or communication needs;

- Bullying, harassment or peer relationships;
- Family circumstances;
- Online influences or risks;
- Existing professional or clinical support; and
- Any other safeguarding concerns.

REQUESTS FOR SOCIAL TRANSITION

Requests relating to social transition, including changes to names, pronouns, clothing or other aspects of presentation, will be considered individually and in accordance with current law and statutory guidance.

BCA will not adopt a one-size-fits-all approach.

When considering a request, the Academy will consider:

- The student's best interests;
- Age and maturity;
- The student's wishes and circumstances;
- Any safeguarding or welfare concerns;
- The impact upon the student and other students;
- Relevant clinical advice, where available;
- The views of parents/carers where appropriate; and
- BCA's legal obligations, including safeguarding, equality and human rights duties.

Significant decisions and the rationale for them will be appropriately recorded and kept under review.

PARENTS AND CARERS

For students under 18, BCA recognises the important role of parents and carers and will seek to involve them in significant decisions wherever possible.

Where a student requests that information is not shared with their parent/carer, the circumstances will be considered carefully.

Where there is reason to believe that involving a parent/carer may place the student at significant risk of harm, the DSL will determine the appropriate safeguarding response and whether advice or referral to Children's Social Care or another relevant agency is required.

RESPECT, BULLYING AND DISCRIMINATION

All students must be treated with dignity and respect.

Bullying, harassment, intimidation, sexual harassment, discriminatory behaviour or deliberate targeting of a student because they are questioning their gender will not be tolerated.

BCA will also respect the lawful rights and beliefs of other students and staff.

Differences of belief or opinion must be managed respectfully and must not result in bullying, harassment or discrimination.

SINGLE-SEX FACILITIES AND ACCOMMODATION

BCA will manage toilets, changing facilities and any other single-sex spaces in accordance with current law and statutory guidance.

Students should not be permitted to use single-sex facilities designated for the opposite biological sex where statutory guidance requires those facilities to remain single-sex.

Where a student does not wish to use facilities designated for their biological sex, BCA will seek to provide a suitable alternative that protects the student's privacy, dignity and safety without compromising appropriate single-sex provision.

Any overnight or residential arrangements will similarly take account of biological sex, privacy, dignity, safeguarding and current statutory guidance.

SPORT AND PHYSICAL ACTIVITY

Where sport or physical activity is organised on a single-sex basis for reasons of safety or fairness, BCA will follow current law, statutory guidance and, where relevant, the rules of the appropriate sporting body.

Where an activity does not require separation by sex, BCA will seek to maximise students' participation while considering safety, fairness, dignity and inclusion.

CONFIDENTIALITY AND INFORMATION SHARING

Information about a student's gender questioning will be handled sensitively and shared only where there is a legitimate reason to do so.

Staff must not promise absolute confidentiality.

Safeguarding information will be shared where necessary and proportionate to protect a student or another child from harm.

Significant safeguarding decisions, information sharing and the rationale for decisions will be appropriately recorded.

REVIEW AND PROFESSIONAL ADVICE

Individual arrangements should be reviewed where circumstances change, new safeguarding information emerges or the student's needs develop.

The DSL or senior leader should seek appropriate safeguarding, legal, local authority or clinical advice where a situation is complex or there is uncertainty about the appropriate response.

BCA will keep its approach under review to ensure that it reflects current statutory guidance and legal requirements.

KEY PRINCIPLE

BCA will respond to students questioning their gender with **sensitivity, respect and professional curiosity**, while ensuring that safeguarding remains central to decision-making.

Decisions will be made **individually, in the student's best interests, with parents/carers involved wherever possible and with appropriate consideration of the rights, safety and welfare of all students**.

APPENDIX 13
SERIOUS YOUTH VIOLENCE, COUNTY LINES AND CRIMINAL EXPLOITATION FRAMEWORK

PURPOSE

Big Creative Academy recognises that some students may be vulnerable to criminal exploitation, serious youth violence and county lines activity.

These risks may be linked to:

- Gang association;
- Drug distribution networks;
- Serious violence;
- Exploitation by adults or peers;
- Debt bondage;
- Coercion and control;
- Online recruitment.

INDICATORS

Staff should remain alert to:

- Unexplained money or possessions;
- Multiple mobile phones;
- Missing episodes;
- Sudden changes in behaviour;
- Fear of certain individuals;
- Frequent travel to unfamiliar areas;
- Injuries associated with violence;
- Increased secrecy.

RESPONSE

Concerns must be reported immediately to the DSL. The DSL may:

- Complete a safeguarding risk assessment;
- Refer to Children's Social Care;
- Refer to Police;
- Engage Violence Reduction Units;
- Internal interventions such as routine security checks;
- Initiate multi-agency intervention

APPENDIX 14
MENTAL HEALTH AND WELLBEING FRAMEWORK

PRINCIPLES

BCA recognises that mental health concerns may:

- Be an indicator of abuse or neglect;
- Increase vulnerability;
- Affect attendance and engagement;
- Increase safeguarding risk.

STAFF RESPONSIBILITIES

Staff should:

- Be alert to changes in presentation;
- Promote wellbeing;
- Report concerns;
- Avoid diagnosing mental health conditions.

INDICATORS

May include:

- Persistent low mood;
- Self-harm concerns;
- Anxiety;
- Withdrawal;
- Significant behaviour changes;
- Suicidal ideation;
- Emotional distress.

RESPONSE

Concerns should be referred to the DSL and relevant support services.

The DSL may:

- Complete a safeguarding risk assessment;
- Refer to Children's Social Care;
- Internal interventions;
- Initiate multi-agency intervention.

APPENDIX 15
ATTENDANCE, MISSING EDUCATION AND WELFARE PROCEDURE

PURPOSE

BCA recognises that poor attendance may be an indicator of safeguarding concerns.

Potential Risks

- Exploitation;
- Abuse;
- Neglect;
- Mental health concerns;
- Criminal involvement;
- Homelessness;
- Family difficulties.

STAFF RESPONSIBILITIES

Where attendance concerns arise:

- Follow attendance procedures – see Attendance and Punctuality Policy;
- Escalate concerns promptly;
- Refer safeguarding concerns to the DSL.

MISSING STUDENTS

Where a student is unexpectedly absent and welfare concerns exist:

- Police welfare checks may be undertaken;
- Emergency contacts may be contacted;
- Referrals may be made where necessary.

APPENDIX 16
PROFESSIONAL CURIOSITY GUIDANCE

DEFINITION

Professional curiosity means:

- Looking beyond the obvious;
- Exploring concerns;
- Seeking clarification;
- Challenging assumptions.

WHY IT MATTERS

Serious safeguarding cases often identify situations where warning signs were present but not explored.

BCA adopt the culture that it DOES happen here, rather than it COULD happen here.

EXPECTATIONS

Staff should:

- Ask appropriate questions;
- Record concerns;
- Escalate concerns;
- Consider wider context;
- Remain professionally sceptical where necessary.

BCA promotes a culture where challenge and professional curiosity are encouraged.

APPENDIX 17
WORK EXPERIENCE AND INDUSTRY PLACEMENT SAFEGUARDING

PURPOSE

Big Creative Academy recognises its responsibility to safeguard students undertaking:

- Industry placements;
- Work experience;
- Employer engagement activities;
- External performances;
- Creative industry projects.

BEFORE PLACEMENT

BCA will:

- Assess suitability of placements;
- Consider safeguarding risks;
- Provide students with safeguarding guidance;
- Establish reporting arrangements.

DURING PLACEMENT

Students must know:

- How to report concerns;
- Who to contact;
- How to access support.

EMPLOYERS

Employers are expected to:

- Maintain safe environments;
- Report safeguarding concerns;
- Cooperate with safeguarding processes.

APPENDIX 18
SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT STAFF: LOW-LEVEL CONCERNS

PURPOSE

Big Creative Academy is committed to creating a culture in which all concerns about adults working with children are identified, reported, recorded and responded to appropriately.

This appendix applies to concerns about:

- Employees;
- Supply and agency staff;
- Volunteers;
- Contractors;
- Governors;
- External professionals; and
- Other adults working with or having responsibility for students.

A low-level concern does not mean that the concern is insignificant. Concerns about an adult's behaviour should be taken seriously, however small they may initially appear.

This appendix should be read alongside:

- Keeping Children Safe in Education 2026;
- The London Safeguarding Children Procedures;
- The Academy's Staff Code of Conduct;
- Whistleblowing Policy;
- Disciplinary procedures; and
- Procedures for managing allegations that meet the harm threshold.

WHAT IS A LOW-LEVEL CONCERN

A low-level concern is any concern that an adult working in or on behalf of the Academy may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- Does not meet the harm threshold or is otherwise not sufficiently serious to require management under the allegations procedure.

A low-level concern may arise from something small, including behaviour that creates a sense of unease or a concern that an adult's conduct may not be appropriate.

Examples may include, but are not limited to:

- Being over-friendly with students;
- Having favourites;
- Taking photographs of students contrary to Academy policy;
- Engaging with a student one-to-one in a secluded area or behind a closed door where this is inappropriate;
- Using inappropriate, sexualised, intimidating or offensive language;
- Communicating with students through inappropriate channels;
- Failing to maintain appropriate professional boundaries; or
- Other conduct inconsistent with the standards expected of adults working with children.

The context and circumstances of the behaviour must always be considered.

THE HARM THRESHOLD

A concern must be managed under the Academy's allegations procedure where an adult working with children has:

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

The final criterion may include behaviour outside the Academy and does not require the behaviour to have involved a BCA student.

REPORTING LOW-LEVEL CONCERNS

All staff are expected to report low-level concerns.

Concerns should be reported as soon as reasonably possible in accordance with the Academy's reporting arrangements.

Staff should not:

- Attempt to investigate the concern themselves;
- Confront the individual concerned;
- Seek statements from students or witnesses unless authorised to do so;
- Discuss the concern unnecessarily with colleagues; or
-
- Decide themselves that the concern is too minor to report.

The purpose of reporting low-level concerns is to support a culture of openness, transparency and professional accountability and to enable potential patterns of concerning behaviour to be identified at an early stage.

WHO SHOULD RECEIVE THE CONCERN?

Low-level concerns should normally be reported to the Principal or the DSL.

Where the concern relates to the Principal, it must be reported to the Chair of Governors or other person identified within the Academy's governance arrangements.

Where the concern relates to an individual responsible for receiving low-level concerns, an alternative reporting route must be used.

The Designated Safeguarding Lead may support the safeguarding aspects of the process, but responsibility for the management of staff conduct concerns must remain clear.

CONSULTATION WITH THE LADO

In accordance with the London Safeguarding Children Procedures, the evaluation of low-level concerns will be undertaken in consultation with the Local Authority Designated Officer (LADO).

Consultation with the LADO supports objective consideration of:

- Whether the information meets or may meet the harm threshold;
- Whether the matter remains a low-level concern;
- Whether other information may be relevant;
- Whether further safeguarding action is required; and
- The appropriate route for managing the concern.

Where there is any uncertainty as to whether a concern meets the harm threshold, the Academy will consult the LADO.

The Academy will not delay appropriate action necessary to protect a child while seeking advice.

WHERE THE HARM THRESHOLD IS MET OR MAY BE MET

Where information indicates that the harm threshold is met, or may be met, the matter will cease to be managed solely as a low-level concern.

The Academy will follow its procedure for managing allegations against adults working with children and the applicable London Safeguarding Children Procedures.

The LADO will be contacted in accordance with local procedures before the Academy undertakes any substantive investigation that could compromise a safeguarding, police or LADO process.

Where a child is at immediate risk of harm, the Academy will take immediate safeguarding action and contact the Police and/or Children's Social Care as appropriate.

INITIAL EVALUATION

Following receipt of a low-level concern, the Principal or nominated person should establish sufficient information to understand:

- What is alleged to have happened;
- When and where it occurred;
- Who was involved;
- Whether any students may have been affected;
- Whether there are witnesses;
- Whether there have been previous concerns; and
- Whether immediate safeguarding action is necessary.

This is an initial fact-finding and threshold-assessment process and must not become an unauthorised investigation.

The LADO should be consulted as required by the London Safeguarding Children Procedures.

THIRD-PARTY AND ANONYMOUS REPORTS

Low-level concerns may be raised by:

- Students;
- Parents or carers;
- Members of staff;
- Visitors;
- Contractors;
- Employers or placement providers;
- External professionals;
- Members of the public; or
- Other third parties.

Where a concern is raised by a third party, the Principal or nominated deputy should gather sufficient information to understand and appropriately categorise the concern.

Where possible, this may include speaking to:

- The person who raised the concern, unless the report was anonymous;
- The individual concerned; and
- Relevant witnesses.

Anonymous reports will not be disregarded solely because the identity of the person raising the concern is unknown.

The reliability, context and available evidence will be considered when determining appropriate action.

RECORDING LOW-LEVEL CONCERNS

All low-level concerns will be recorded in writing.

The record should include:

- Details of the concern;
- The context in which it arose;
- The source of the information, where known;
- Relevant evidence or information considered;

- LADO consultation and advice;
- Decisions made;
- The rationale for those decisions;
- Actions taken; and
- The outcome, where known.

Records will be held securely and confidentially with access restricted to those who require the information for legitimate safeguarding or management purposes.

REVIEWING FOR PATTERNS

Low-level concern records will be reviewed periodically to identify whether:

- Concerns have been raised previously about the same individual;
- A pattern of behaviour is developing;
- Wider cultural or organisational issues may be contributing to the behaviour;
- Additional training or guidance is required; or
- The accumulated concerns now indicate that the harm threshold may be met.

Where a pattern of low-level concerns means that behaviour may meet the harm threshold, the matter will be managed under the allegations procedure and referred to or discussed with the LADO as appropriate.

The Academy will also consider whether policies, training, supervision, leadership or organisational culture require improvement.

POSSIBLE OUTCOMES

Where the concern remains below the harm threshold following evaluation and LADO consultation, appropriate action may include:

- No further action beyond recording the concern;
- Management advice;
- Clarification of professional expectations;
- Additional supervision;
- Training or professional development;
- Review of working practices;
- Increased monitoring;
- Action under the Staff Code of Conduct;
- Capability or disciplinary procedures where appropriate; or
- Further safeguarding review.

The response will be proportionate to the circumstances and nature of the concern.

SELF-REFERRAL

The Academy encourages staff to report situations where they believe they may have acted in a way that could be:

- Misinterpreted;
- Inconsistent with the Staff Code of Conduct;
- Perceived as falling below expected professional standards; or
- Considered a low-level concern.

Self-referral is an important element of an open safeguarding culture and enables concerns to be considered transparently and appropriately.

CONFIDENTIALITY

Low-level concerns will be handled sensitively and confidentially.

Information will only be shared with individuals who need it for safeguarding, management, legal or regulatory purposes.

The Academy will balance confidentiality with its responsibility to safeguard children and comply with statutory and local safeguarding procedures.

REFERENCES

Low-level concerns will not automatically be included in employment references.

The Academy will follow current statutory guidance when determining what safeguarding information must or may lawfully be included in a reference.

Where a group or pattern of concerns becomes substantiated safeguarding information that meets the harm threshold, this will be considered in accordance with Keeping Children Safe in Education and applicable safer recruitment requirements.

GOVERNANCE AND QUALITY ASSURANCE

The Principal will ensure that appropriate systems exist for:

- Recording low-level concerns;
- Consulting the LADO;
- Reviewing concerns for patterns;
- Monitoring actions and outcomes; and
- Identifying wider organisational learning.

The Governing Body will receive appropriate anonymised assurance regarding the effectiveness of the Academy's arrangements for managing allegations and low-level concerns.

APPENDIX 19

DOMESTIC ABUSE AND OPERATION ENCOMPASS

DOMESTIC ABUSE

Big Creative Academy recognises that domestic abuse can have a significant impact on a student's safety, wellbeing, relationships, attendance, behaviour and ability to learn.
Domestic abuse can include:

- Physical or sexual abuse;
- Violent or threatening behaviour;
- Controlling or coercive behaviour;
- Economic abuse; and
- Psychological, emotional or other abuse.

Domestic abuse may be a single incident or a pattern of behaviour and may occur in person or through technology.

BCA recognises that domestic abuse can affect students in different ways. A student may:

- Experience domestic abuse within their family or household;
- See, hear or experience the effects of abuse between family members;
- Experience abuse within their own intimate relationship;
- Be affected by abuse involving siblings or other family members; or
- Display harmful or abusive behaviour themselves.

Children who see, hear or experience the effects of domestic abuse are recognised as victims in their own right where the statutory criteria are met.

RECOGNISING CONCERNS

There is no single indicator of domestic abuse.
Possible signs may include:

- Changes in behaviour, mood or presentation;
- Anxiety, distress or withdrawal;
- Unexplained injuries;
- Changes in attendance or punctuality;
- Deterioration in learning or engagement;
- Fearfulness about going home;
- Controlling behaviour within a relationship;
- Isolation from friends or family;
- Excessive monitoring through phones or social media;

- Sexual coercion or pressure;
- Financial or economic control; or
- A disclosure by the student or another person.

Staff should remain professionally curious and consider the student's circumstances as a whole.

RESPONDING TO A CONCERN

Any concern or disclosure relating to domestic abuse must be reported to the DSL or Deputy DSL without delay.

Staff should:

- Listen without judgement;
- Take the student seriously;
- Avoid unnecessary or leading questions;
- Not promise confidentiality;
- Make an accurate record; and
- Report the concern promptly.

The DSL will consider the student's immediate safety and welfare and determine whether further safeguarding action, safety planning, Early Help, specialist domestic abuse support or referral to Children's Social Care or Police is required.

Where there is immediate danger or risk of serious harm, emergency safeguarding action will be taken.

TEENAGE RELATIONSHIP ABUSE

BCA recognises that students aged 16 and 17 can experience domestic abuse within their own intimate relationships.

Abuse may include physical violence, sexual abuse, coercive or controlling behaviour, emotional abuse, economic abuse, stalking, harassment or technology-facilitated abuse.

Concerns about abuse within students' relationships will be treated as safeguarding concerns and considered alongside BCA's child-on-child abuse procedures where appropriate.

The Academy will consider the needs and safety of all students involved and seek specialist or statutory support where required.

OPERATION ENCOMPASS

BCA participates in **Operation Encompass**, the statutory police and education information-sharing arrangement that enables educational settings to provide timely support to children affected by domestic abuse.

Police are required to notify a relevant educational establishment where they have reasonable grounds to believe that a child may be a victim of domestic abuse following a domestic abuse incident.

This can include students who:

- Were present during the incident;
- Saw, heard or experienced its effects;
- Live in or are connected to the household; or
- Were not physically present at the time of the incident.

Operation Encompass applies to eligible students under 18 attending further education colleges and 16–19 academies.

RECEIVING AN OPERATION ENCOMPASS NOTIFICATION

Operation Encompass notifications will be received by BCA's appropriately trained **Key Adult**, normally the DSL or Deputy DSL.

On receiving a notification, the DSL/Key Adult will:

- Consider the student's immediate safety and welfare;
- Review relevant safeguarding information;
- Consider the impact upon the student's wellbeing and education;
- Determine what support is required;
- Consider whether other children may be at risk;
- Determine whether further safeguarding action or referral is required; and
- Record the notification, assessment, decision and actions.

Support will be proportionate to the student's individual circumstances and may include pastoral support, a trusted adult, safety planning, appropriate flexibility around learning or attendance, Early Help or referral to specialist services.

Students should not be unnecessarily required to repeat or discuss the domestic abuse incident in order to receive support.

SAFEGUARDING REFERRALS

An Operation Encompass notification **does not replace BCA's normal safeguarding procedures or a safeguarding referral**.

Where information indicates that a student may be suffering or likely to suffer significant harm, or otherwise requires statutory safeguarding intervention, the DSL will make an appropriate referral in accordance with BCA's safeguarding procedures and local thresholds.

BCA will not assume that another agency has taken safeguarding action simply because an Operation Encompass notification has been received.

INFORMATION SHARING AND RECORDING

Domestic abuse and Operation Encompass information will be treated as sensitive safeguarding information.

Information will be:

- Recorded securely within the student's safeguarding record;
- Shared only where necessary and proportionate;
- Accessible only to those with a legitimate safeguarding need; and
- Managed in accordance with safeguarding information-sharing and data protection requirements.

Records should identify the information received, the DSL's assessment, decisions and rationale, support provided, referrals or agency contact and subsequent review where required.

MULTI-AGENCY WORKING AND SUPPORT

BCA will work with relevant agencies where necessary, including:

- Children's Social Care;
- Police;
- Specialist domestic abuse services;
- Health and mental health services;
- Early Help; and
- Other relevant safeguarding partners.

The DSL will consider the student's wishes and circumstances when determining appropriate support, while recognising that safeguarding information may need to be shared without consent where necessary to protect a child from harm.

TRAINING AND GOVERNANCE

Staff will receive appropriate safeguarding training to understand:

- The impact of domestic abuse on children and young people;
- Possible indicators of abuse;
- Teenage relationship abuse;
- How to respond to a disclosure; and
- How and when to report concerns.

The DSL/Key Adult will understand BCA's Operation Encompass arrangements and how to respond appropriately to notifications.

Leaders will ensure that domestic abuse and Operation Encompass are embedded within BCA's wider safeguarding arrangements and that notifications and concerns result in appropriate assessment, support and action.