



## **Child Safeguarding Policy**

**We are also committed to reviewing policy and good practice annually. This policy is reviewed by Su Langley and Mike Stringer annually in September.**

**This policy was last reviewed:** September 2025

**Next Review Date:** September 2026

Signed:.....|.....Su Langley (Designated Safeguarding Officer)

Signed: :.....Mike Stringer (Deputy Designated Safeguarding Officer)

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### **1. Introduction**

Bonterre CIC believes that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people, by a commitment to practise which protects them.

This policy applies to all staff, including senior managers and the board of Directors, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of Bonterre CIC.

It applies, in its entirety, to all education providers, and childcare settings. It applies to all children up to the age of 18 years whether living with their families, in state care, or living independently.

#### **Legal framework**

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely

:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Protection of Freedoms Act 2012
- 'Working Together to Safeguard Children' 2023
- Worcestershire Safeguarding Children's Board
- Keeping Children Safe in Education 2025
- Mental capacity act 2005

#### **We recognise that:**

- the welfare of the child/young person is paramount
- all children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents, carers and their agencies is essential in promoting young people's welfare.

#### **The purpose of this policy:**

- Protecting children from maltreatment, whether that is within or outside the home, including online



- To provide protection for the children and young people who receive Bonterre CIC services, including the children of adult members or users.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.
- Providing help and support to meet the needs of children as soon as problems emerge

**We will seek to safeguard children and young people by:**

- valuing them, listening to and respecting them.
- adopting safeguarding guidelines through procedures and a code of conduct for staff and volunteers.
- recruiting staff and volunteers safely, ensuring all necessary checks are made.
- sharing information about child protection and good practice with children, parents, staff and volunteers.
- sharing information about concerns with agencies who need to know, and involving parents and children appropriately.
- providing effective management for staff and volunteers through supervision, support and training.

**Multi-Agency Working**

Bonterre CIC recognises that safeguarding children is most effective when agencies work together. In line with *Working Together to Safeguard Children 2023*, all staff have a duty to collaborate with external agencies, including local authorities, health services, the police, and other professionals, to protect children at risk of harm. Roles and responsibilities are clearly defined: the Designated Safeguarding Lead (DSL) coordinates referrals and communication, while all staff must share relevant information promptly and accurately. Multi-agency collaboration ensures that concerns are addressed quickly, safeguarding plans are effective, and children receive the support they need.

**Informed Consent**

Bonterre CIC will adhere to the principles of the Mental Capacity Act 2005 in assessing the capacity of individuals aged 16 and over to make decisions. We will assume that individuals have capacity unless proven otherwise. Assessments will be conducted in a clear, unbiased manner, considering the individual's communication style and any potential impairments. We will evaluate their ability to understand information, retain it, weigh up options, and communicate their choices. If there is uncertainty about an individual's capacity, we will consult with appropriate healthcare



professionals or legal experts to obtain a formal assessment. In accordance with the Act, we will implement safeguards to protect the individual's best interests, including seeking appropriate support and ensuring their well-being.

## Contact information

**DSL** - Su Langley

Email - [su@bonterre.co.uk](mailto:su@bonterre.co.uk)

Phone- 07879072103

**DDSL** - Mike Stringer

Email- [Mike@bonterre.co.uk](mailto:Mike@bonterre.co.uk)

Phone - 07734774250

## 2. Recognising Abuse

In the Children Acts 1989 and 2004, a **child** is anyone who has not yet reached their 18th birthday.

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (2010) as:

- protecting children from maltreatment; whether that is inside or outside the home including online.
- preventing impairment of children's mental or physical health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

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

The Children Act 1989 introduced the concept of **significant harm** as the threshold that justifies compulsory intervention in family life in the best interests of children, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

## Physical abuse



Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

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

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development:

- It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- It may 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. This can also occur when a child is a young carer for a parent who is disabled, has mental health problems or misuses alcohol or drugs.
- It may involve seeing or hearing the ill-treatment of another – for example where there is fighting or violence in the home.
- It may involve serious bullying (including via electronic media), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).



Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## **Sexual Violence**

Sexual violence refers to any sexual act, behaviour, or threat of a sexual nature that is committed against a person's will or without their consent. In the context of *Keeping Children Safe in Education (KCSIE) 2025*, all staff have a duty to recognise that sexual violence can occur between children (child-on-child abuse) as well as between adults and children, in person or online. It includes, but is not limited to, rape, assault by penetration, and sexual assault. The school is committed to creating a safe and respectful environment where all learners feel protected and supported. Any disclosure, concern, or allegation of sexual violence will be taken seriously, reported immediately to the Designated Safeguarding Lead (DSL), and handled in line with statutory guidance and local safeguarding procedures. The school will ensure that victims are listened to, supported, and never made to feel blamed, while appropriate action is taken to safeguard all pupils involved.

Further changes can be found in Part Five of KCSIE concerning child-on-child sexual violence and sexual harassment.

[The Lucy Faithfull Foundation's "Shore Space"](#), a confidential chat service to assist young people who are concerned about their own or someone else's sexual thoughts or behaviour

## **Exploitation**

### **Child sexual exploitation (CSE)**

Is a type of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. Children and young people in sexually exploitative situations and relationships are persuaded or forced to perform sexual activities or have sexual activities performed on them in return for gifts, drugs, money or affection. CSE can take place in person, online, or using a combination of both.



## **Child Criminal Exploitation**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## **Domestic abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## **Female Genital Mutilation (FGM).**

Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

## **Mental Health**



All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to follow their school or college's child protection policy, and by speaking to the designated safeguarding lead or a deputy.

### **Gender Questioning**

Bonterre is committed to providing a safe, respectful, and supportive environment for all pupils, including those who are questioning their gender. Bonterre recognises that children who are questioning their gender may require additional pastoral support and that this can be a sensitive and complex area. Staff will approach all situations with care, neutrality, and respect, ensuring that pupils are listened to and supported without judgment or assumption. The welfare and safeguarding of the child will remain Bonterre's primary concern at all times. Any disclosures or concerns relating to gender questioning will be managed in accordance with safeguarding procedures, ensuring that parents or carers are appropriately involved and that decisions are made in the best interests of the child. Staff will receive training to understand the links between gender questioning, emotional wellbeing, and potential safeguarding indicators, enabling them to respond with empathy, professionalism, and consistency.

### **Child on Child abuse**

All staff should recognise that children are capable of abusing other children (including online). Child on child abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences. It can result in significant, long lasting and traumatic isolation, intimidation or violence to the victim. Children or young people who harm others may have additional or complex needs e.g. significant disruption in their own lives, exposure to domestic abuse or witnessing or suffering abuse, educational under-achievement, being involved in crime. It should be recognised that child on child abuse is harmful to both the perpetrator and the victim.

This form of abuse is when there is any kind of physical, sexual, emotional or financial abuse or coercive control exercised between children/young people both on and offline . It is essential that all staff understand the importance of challenging inappropriate behaviours between children/young people. Downplaying certain



behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; or not recognising that emotional bullying can sometimes be more damaging than physical harm and should be taken equally seriously, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios, a culture that normalises abuse leading to children/young people accepting it as normal and not coming forward to report it. Stopping harm and ensuring immediate safety is an education setting’s first priority.

## **Neglect**

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or to ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to a child’s basic emotional needs.

The above list is not meant to be definitive but a guide to assist you. It is important to remember that many children and young people will exhibit some of these indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour, such as a death or the birth of a new baby in their family, relationship problems between parents/carers, etc.

## **What may give cause for concern?**

- bruising on parts of the body which do not usually get bruised accidentally, for example around the eyes, behind the ears, back of the legs, stomach, chest, cheek and mouth (especially in a young baby), etc.
- unusual burn or scald marks
- human bite marks
- any injuries or swellings, which do not have a satisfactory explanation
- altering growth, weight loss and slow development
- unusual lethargy
- any sudden uncharacteristic change in behaviour, for example a child or young person becomes either very aggressive or withdrawn



- a child or young person whose play and language indicates a sexual knowledge beyond his/her years
- a child or young person who flinches away from sudden movement
- a child or young person who gives over-rehearsed answers to explain how his/her injuries were caused
- an accumulation of a number of minor injuries and/or concerns
- a child or young person who discloses information which may indicate he/she is being abused
- concern about a parent or carer's behaviour or presentation, for example evidence of possible alcohol or drug misuse, mental health difficulties, or domestic violence
- concern about arrangements for the collection of the child or young person

**A cluster of these signs should increase concern.**

### **Children and young people with a disability**

Children and young people with a disability may attend Bonterre CIC. You should be aware that some children and young people, because of their learning or physical disability, are vulnerable and may find it more difficult to recognise and report abuse.

#### **Their disability may mean that:**

- their life experiences are limited, creating difficulty recognising inappropriate behaviour.
- they are afraid of challenging people, concerned that they will anger an authority figure or get into trouble
- Communication difficulties make it hard to report abuse.
- they may not be able physically to leave an abusive situation.
- they receive intimate physical care and, therefore, the abuse may seem 'normal'.
- their self-esteem and self-image are poor.
- they might not be aware to whom they can report abuse.
- authority figures are unwilling to believe that anyone would abuse a disabled child or young person.

### **Children who are lesbian, gay, bisexual, or gender questioning**

Exploring their sexuality without the guidance and support of a network, puts queer adolescents at risk of exploitation by predatory individuals and increases the risk of unsafe practices. A LGBTQI+ inclusive education can help to reduce the risk of mental health issues among children and young people.



## **Prevent**

Prevent is a government strategy designed to stop people becoming terrorists or supporting terrorist or extremist causes, including the extreme right wing, violent Islamist groups and other causes.

At Bonterre, we can provide a safe place for pupils to discuss these issues so they better understand how to protect themselves.

What signs are there to look out for if you are concerned about a child?

- Suddenly changing how they dress or their appearance.
- Losing interest in friends or activities not associated with a particular ideology, with their behaviour becoming focused on an extreme idea or cause.
- Possessing or being associated with material or symbols associated with an extremist cause (e.g. the swastika for far-right groups), being in communication with suspected extremists, use of Internet or other social media sites associated with extremism.

If you have a concern that someone may be on the route to radicalisation, you must report your concerns adopting the Bonterre Child Protection Procedure below.

### **3. Child Protection Procedure**

#### **In the event of a disclosure or suspicion of child abuse:**

- Keep calm. Do not be shocked.
- Listen to the child or young person.
- Accept what you hear without passing judgement.
- Ask questions only for clarification.
- Do not investigate.
- Do not make promises.
- Offer support and understanding, explaining that you cannot keep it secret and what may happen. (This gives them the choice to continue telling you or to stop.)
- Reassure the child or young person that they were right to talk to you.
- Write down notes of your conversation – dates, times, facts, who were involved, observations, and use actual words used if possible. Bonterre CIC has specific forms to assist in this process.
- Report to the Designated Safeguarding Officer or Deputy as soon as possible (or contact immediately if you believe the matter is urgent).

#### **Ensure that you have the following information:**

- name(s), address, date(s) of birth of the child/children or young person/people



- parent/carer's name and contact details
- name of the person against whom the complaint has been made
- names of any witness to the incident (if appropriate)
- Keep notes of your conversation with the Designated Person and any advice offered.
- Sign and date the notes and keep them in a confidential file.
- Act on the advice given. This may be for you, or the Designated Safeguarding Officer, to make a referral to Children's Services on 0845 607 2000.

**Procedure for responding to an allegation of abuse against or a cause for concern about the unsuitability of a member of staff, a volunteer or a member of the management team:**

Every allegation, whether made by a child, young person, parent, carer or another member of the organisation/group must be taken seriously and treated in accordance with government guidelines.

- Do not immediately discuss the allegation/concern with the individual concerned.
- Raise the allegation/concern with the line manager or the Designated Safeguarding Officer.
- The allegation/concern will be assessed by the Designated Safeguarding Officer. No investigation should be conducted at this point.
- Consider whether the child or young person has the capacity to consent to safeguarding decisions under the mental capacity act 2005
- Providing help and support to meet the needs of children as soon as problems emerge.

**There are then three possible outcomes:**

1. It is agreed there is no cause for concern.
2. It is agreed that there is concern but it is not in the category of child protection. It will be dealt with by the line manager and may include using Bonterre CIC's disciplinary procedures.
3. It is agreed that the concern is in the category of child protection so is referred to Children's Services. Children's Services may advise that the individual is suspended or asked not to attend any meetings of Bonterre CIC while the concern is investigated. Suspension should be seen as a neutral act and without prejudice.

A representative of Bonterre CIC may be invited to a Strategy Meeting called by Children's Services to discuss the issues.



## **ALWAYS REMEMBER - IF IN DOUBT - CONSULT**

- Worcestershire LADO : **01905 846221**

**DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.**

All those working with children and young people should record “all concerns, discussions and decisions made including the rationale for those decisions. These recordings should include instances where referrals were or were not made to another agency such as LA children’s social care or the Prevent program etc.”

Recording why you decided not to refer a matter to children’s services may be as important as why you decided to do so. Recording the rationale for decisions even if that decision was to wait and monitor the situation, or not refer can be very useful to counter allegations and criticism that the school did nothing.

### **4. Roles and Responsibilities**

#### **The Designated Safeguarding Officer**

The Designated Safeguarding Officer (DSO) takes the lead responsibility for child protection, including support for other staff and information sharing with other agencies, developing policies and staff training. The DSO is also the named person who responds to allegations made against members of staff. However where appropriate the Deputy DSO may take the lead.

The DSO is Su Langley. The deputy DSO is Mike Stringer.

#### **DSO Responsibilities**

- Refer suspected abuse and neglect to the First Response Service
- Report allegations made against members of staff to the Local Authority Designated Officer (LADO)
- Develop and update Safeguarding policies, ensuring that staff and children/families/parents are aware of them
- Provide support and advice to all members of staff within the setting regarding safeguarding concerns
- Ensure that cover is provided for the role when absent from the setting



- Ensure that a child's safeguarding file is copied for the new educational establishment when a child moves educational settings, and that this file is transferred securely and separately from the main pupil file.
- Ensure that all staff receive appropriate Safeguarding Training, and maintain training records
- Cooperate with any requests for information from the Local Authority, such as Child Protection training returns and self-evaluative forms for safeguarding and child protection, in compliance with Section 11, Children Act 2004

### **Other Staff's Responsibilities**

It is the responsibility of all other members of staff to ensure that all safeguarding concerns, both minor and serious, are reported to the DSO as soon as reasonably possible.

The DSO may have other information regarding a child, young person or their family of which other staff may not be aware. Minor concerns may take on greater significance within the wider context of knowledge of a child or family that the DSO may have.

### **Parents and Carers responsibilities**

Developing good partnerships with parents and carers is the best way to ensure good continuity of care between home and Bonterre CIC. Information sharing is one way towards good practice. Early identification of children with health problems is crucial and a record of this is kept on enrolment. Any accidental injury off-site and whilst not in our care should be reported and a record made to child's file. If a child suffers an accidental injury in our care, contact will be made with parents or carers immediately and a record of the accident will be made.

For further details please see our Health and Safety policy.

## **5. Safer working practices**

Ensure everyone at the organisation:

- understands that they have a duty to keep the children and young people in their care safe and it is everyone's priority;
- knows and understands the policies and procedures in place to keep everyone in the organisation safe;
- knows that they are responsible for their actions and should not behave in a way that may bring their conduct into question;
- works, and is seen to work, openly and transparently;



- works towards the same professional standards and boundaries;
- knows who to speak to if they have any concerns about the behaviour of a colleague;
- is familiar with local child protection arrangements;
- receives regular training so they understand their responsibilities and know what to do if they believe a child or young person is at risk of harm.

## **6. Safer Recruitment**

### **We recognise that:**

- our workforce is our most important resource
- unsuitable individuals sometimes seek out opportunities via employment or volunteering to have contact with children in order to harm them
- some groups face unfair discrimination in the workplace
- children, young people and families benefit from our efforts to recruit and select a skilled and committed workforce from a diverse range of backgrounds
- new staff and volunteers cannot perform their role effectively unless they are inducted properly and receive ongoing support and supervision

### **We recruit and induct our workforce by:**

- publicise all posts in a way that ensures that we attract high quality applicants from diverse backgrounds
- ensuring that all applications for both paid and volunteer positions are made using our standard application form
- having at least two people conducting a face to face meeting with anyone we may want to appoint
- obtaining two references, two pieces of identification and original copies of any necessary qualifications from candidates
- requiring that all staff and volunteers have an up to date relevant DBS check where their post is eligible for this (including a check against the barred list if the post involves regulated activity)
- providing an appropriate induction for all new staff and volunteers ensuring that all staff are made aware, during their induction period, of how to keep children and young people safe in our organisation
- appointing all staff and volunteers on a trial period initially, with a review before they are confirmed in post



- Maintaining a Single Central Record (SCR) that accurately records all required checks for staff, volunteers, and contractors.
- Ensuring at least one member of every recruitment panel has completed accredited safer recruitment training.
- Keeping recruitment and vetting records in line with data protection and record-keeping requirements.

## **7. Confidential Reporting**

Bonterre CIC is committed to safeguarding and promoting the welfare of children and young people. Our safer recruitment and whistleblowing procedures are designed to ensure that only individuals who share this commitment are appointed and that all staff and volunteers feel confident and supported to raise concerns about poor or unsafe practice.

### **Whistleblowing**

Bonterre CIC's aim is to provide an internal procedure that enables all adults in the setting to raise serious concerns about any aspect of practice in confidence and without fear of reprisal. This ensures that the organisation continues to operate in line with safeguarding best practice and statutory expectations.

Concerns may relate to the actions or behaviours of staff, students, volunteers, contractors, or others associated with the setting, and may include:

- Unlawful acts or omissions
- Failure to comply with Bonterre CIC's policies and safeguarding procedures
- Poor or unsafe practice
- Improper conduct that may place children or staff at risk

Concerns should normally be raised with a Manager or the Designated Safeguarding Lead (DSL). If the concern relates to management, or if staff feel unable to report internally, they should contact the Local Authority Designated Officer (LADO), the Access Centre, or the Whistleblowing Advice Line provided by the Department for Education.

Concerns should ideally be submitted in writing and include:



- A statement indicating that it is a confidential disclosure
- The background and history of the concern (with names, dates, and places where possible)
- The reason for the concern

Anyone unable to submit concerns in writing may speak directly with a manager or contact the relevant external safeguarding authority.

### **Investigation and Response**

All concerns will be taken seriously and investigated promptly and fairly. The nature of the concern will determine whether it is investigated internally or referred to an external agency.

- Bonterre CIC will aim to provide a written response within 28 days of the concern being raised.
- Concerns relating to abuse or potential criminal conduct will be referred immediately to the appropriate external agencies in line with statutory procedures.
- Where malicious allegations are found to have been made, disciplinary action may be taken.

### **Confidentiality and Protection**

Bonterre CIC will make every effort to protect the identity of the whistleblower, though anonymity cannot be guaranteed if the matter requires external investigation. No person will suffer detriment or disciplinary action for raising a genuine safeguarding or conduct concern in good faith.

This policy may be superseded by the organisation's Disciplinary or Complaints Procedures where appropriate.



## **8. Visitors**

- All visitors must be supervised by a member of staff when there are young people/vulnerable adults on site.
- Staff to be aware of any suspicious behaviour by strangers near to Bonterre CIC, if you see any unusual or suspicious behaviour you must telephone the police immediately.

## **9. Positive Physical Intervention**

- We recognise that touch is appropriate in the context of working with children. Guidance on the use of touch and when it is appropriate to use physical interventions are contained in our Discipline Policy and is made known to all staff and volunteers.
- Physical intervention of a nature that falls outside the Discipline Policy may be considered under management of allegations or staff/volunteer disciplinary procedures.

## **10. Child Protection Training**

The DSO will keep detailed records of all staff's child protection training and will issue reminders when training updates are required.

All members of staff will undertake basic awareness child protection training once a year.

## **11. Confidentiality Policy**

At Bonterre CIC, we respect the rights of young people and their parents and carers with regard to privacy and confidentiality. Some personal information is provided on the referral forms. This will be kept in a secure place and is available only to members of the staff team. In addition, children and young people often build up trusting relationships with adults working with them and share personal and family information with them. This information will only be recorded if, in exceptional cases, it may have an impact on the child/young person or their contact details.

There are rules about what we do with personal information.

### **Technology**

Bonterre CIC recognises the vital role that digital technology plays in education and is committed to ensuring that its use supports safe, effective teaching and learning. In line with *Keeping Children Safe in Education (KCSIE) 2025*, Bonterre CIC will plan, use, and regularly upgrade digital systems to maintain robust standards of online safety and data security. Clear roles and responsibilities are assigned to staff



for the implementation and oversight of filtering and monitoring systems to help protect pupils from harmful or inappropriate online content. All staff are expected to understand their role in promoting safe online behaviour, reporting concerns promptly, and supporting pupils in developing digital resilience. Regular reviews of technology infrastructure, alongside ongoing staff training, will ensure that the school's digital environment remains secure, inclusive, and aligned with safeguarding priorities.

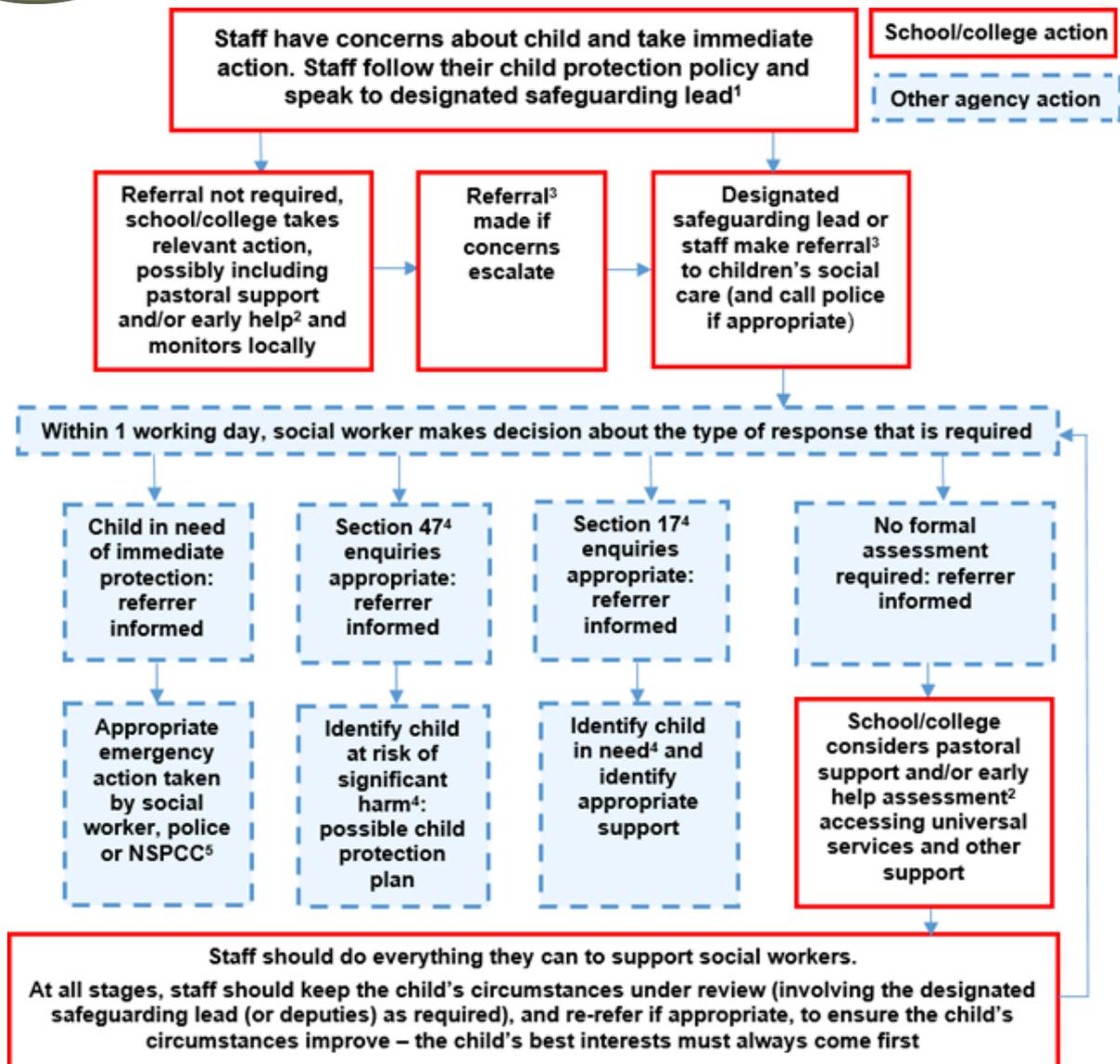
### **Staff Team**

Details of any information will be shared among the staff team only if it is considered to be relevant, for example medical issues in relation to an activity or the taking of medicine.

### **External Agencies**

In most circumstances, and taking into account their understanding, we will not share personal information without talking to the child or young person. This may include the parent or carer. We will encourage children and young people to share information or discuss issues with parents and carers or appropriate outside organisations that may help them.

If a child or young person, however, is at risk of harm or in need of protection or if a parent/carer is at risk of harm or if an offence may be committed we have a responsibility to try to prevent this happening. In these circumstances we would pass on any relevant information to Children's Services or the Police. We will also try to talk to the child or young person first.



## Gossip

We will not gossip about any child, young person or their family with other children or young people, with other adults involved in Bonterre CIC, or with any outsiders.

## 12. Image/video use

All images taken by staff at Bonterre CIC will be used in a manner respectful of the eight Data Protection Principles.

This means that images will be:

- fairly and lawfully processed
- processed for limited, specifically stated purposes only
- used in a way that is adequate, relevant and not excessive



- accurate and up to date
- kept on file for no longer than is necessary
- processed in line with an individual's legal rights
- kept securely

Further information on the processing of personal data (including images) is detailed in Bonterre's Data Protection Policy and Use of Images and Photo Policy.

The DSO and/or Management team is responsible for ensuring the acceptable, safe use and storage of all camera technology and images within the setting.

The DSO reserve the right to view any images taken and/or to withdraw or modify a member of staffs' authorisation to take or make images at any time. All members of staff (including volunteers) will ensure that all images are available for scrutiny and will be able to justify any images in their possession.

Careful consideration is given before involving very young or vulnerable children when taking photos or recordings, who may be unable to question why or how activities are taking place. Images or videos that include children will be selected carefully when used publicly to ensure a child's safety and dignity are not compromised. A child or young person's right not to be photographed is to be respected.

Consideration will be given as to whether it is appropriate to use a child's name on any publicity material, website or social media. If a name is used, it will only be the first name and any comments made will be monitored to ensure that a child's safety or dignity are not compromised

**Only official setting owned equipment (e.g. work provided digital or video cameras) will be used by staff to capture images of children for official purposes. Authorization from a member of the management team must be obtained if a personal camera or phone is to be used.**

### **13. Complaints Policy**

Bonterre CIC recognises the right of children, young people and their parents/carers to have access to Bonterre's complaints procedure. A complaint is any clear expression of dissatisfaction with the group/organisation, its workers, volunteers or management committee or its activities or services.

We will ensure that all complaints are taken seriously and dealt with swiftly and in confidence following the Complaints Procedure. We will learn from any complaints and use them to improve how we operate.



- A complaint can be made – verbally, in writing or by email.
- There are no restrictions on issues which may be complained about including any complaints made against workers or volunteers.
- The senior worker/manager must be notified of any complaint. A member of the Board of Directors should be notified if the complaint is about the senior worker/manager.
- The complainant will be kept informed about the process and the outcome of the complaint.

#### Stage 1 - Informal

- We will respond to the complaint within 10 days. If it cannot be resolved quickly, or if the complainant is still unhappy, it then becomes a formal complaint.

#### Stage 2 – Formal

- A worker or Board member will be appointed to investigate the complaint and will provide a written response on the findings within 25 days.
- If the complaint is not resolved the complainant may request a review panel or appeal.

#### Stage 3 – Review Panel

- The Panel will consist of three people. This may include Board members who have not already been involved in the complaint or people independent of the group/organisation.
- The Panel will not reinvestigate but will review the process and outcome of Stage 2 of the complaint.
- The Panel will recommend whether the complaint should or should not be upheld and will comment on how the complaint was handled. They may make recommendations to the Board.

## 14. Attendance Policy

### Purpose

Bonterre CIC recognises that regular attendance is essential for children’s learning, wellbeing, and safeguarding. Every child has the right to access full-time education, and consistent attendance supports their safety, achievement, and personal development. Bonterre CIC is committed to working in partnership with parents, carers, and external agencies to promote high attendance and to address any barriers that may prevent children from attending regularly.



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## Statutory Framework

This policy reflects the requirements of *Keeping Children Safe in Education (KCSIE) 2025* and the *Working Together to Improve School Attendance* guidance. It forms part of Bonterre CIC's wider safeguarding framework and should be read alongside the Safeguarding and Child Protection Policy. Attendance patterns can be an indicator of underlying safeguarding concerns, including neglect, abuse, or exploitation. Staff are therefore trained to recognise, record, and respond appropriately to attendance issues.

## Responsibilities

- **Parents and carers are responsible for ensuring that their child attends Bonterre CIC regularly and punctually.**
- Bonterre CIC will maintain accurate daily registers, recording attendance and absence in accordance with statutory requirements.
- The Designated Safeguarding Lead (DSL) and safeguarding team will work together to monitor attendance data and identify children at risk of persistent absence or potential harm.
- All staff have a duty to report any attendance concerns promptly to the safeguarding team or DSL.

## Procedures for Following Up Absences

- If a child is absent without prior notification, the Home School/Local Authority will be contacted on the first day of absence, ideally by 10:30 a.m.
- If no explanation is received, further contact attempts will be made using all available communication methods.
- If the child's whereabouts remain unknown and there are safeguarding concerns, the DSL will be informed immediately, and escalation procedures (including contacting the local authority or police) will be followed.



- All absence information, contacts, and outcomes will be recorded and securely stored in line with data protection requirements.
- Patterns of absence or lateness will be reviewed regularly, with early intervention and support offered to families where attendance begins to decline.

## **Monitoring and Review**

Attendance data will be monitored weekly to identify trends or concerns at an individual or cohort level. Persistent or unexplained absence will be addressed through meetings with parents, targeted support, and, where necessary, formal referrals to the local authority's attendance or safeguarding teams.

## **15. Implementation, Dissemination & Review Strategies**

This policy is reviewed annually by the DSO and is approved by the Board of Directors.

All members of staff must read and agree to the child protection policy before the start of their employment.

Copies of this policy are available from the DSO and on the Bonterre CIC website.

## **16. Key Contacts in Child Protection**

### **Children's Social Care**

- Worcester and Malvern Safeguarding Team telephone: **01905 843650**
- Family Front Door : **01905 822666**
- Worcestershire LADO : **01905 846221**
- Children first Emergency contact - **01905 768 020** (Evenings and Weekends)
- Police 24hrs non-emergency 101
- Emergency 999
- NSPCC Helpline 0808 800 5000
- Ofsted 0300 123 1231