



**British Academy**  
School Marrakech  
— Belong Achieve Become —

**SAFEGUARDING & CHILD  
PROTECTION POLICY  
BASM 33**

## **SAFEGUARDING AND CHILD PROTECTION POLICY - SEPTEMBER 2025**

This policy applies to the whole school: Senior, Primary and EYFS.

The Designated Safeguarding Lead at the School is: Mr James Jarrett. – Tel +212 0664 588236, email- [jjarrett@basm.uk](mailto:jjarrett@basm.uk) (Whole School)

The following staff are Deputy Designated Safeguarding Leads:

- Mrs Noeleen Clarke- email: [nclarke@basm.uk](mailto:nclarke@basm.uk) (EYFS)
- Miss Rosalind Burns- email: [rburns@basm.uk](mailto:rburns@basm.uk) (Primary)
- Mr Daniel Fry- email: [dfry@basm.uk](mailto:dfry@basm.uk) (Secondary)

The Advisory Board Safeguarding Member is Nick Pratt – email [nick@isscic.org](mailto:nick@isscic.org)

The NE Chair of the Advisory Board is Nigel Taylor – Tel +447766914547 email [nigel@ngtconsulting.org](mailto:nigel@ngtconsulting.org)

### **1. SAFEGUARDING AND CHILD PROTECTION POLICY STATEMENT**

- 1.1 The British Academy School Marrakech (“the BASM”) is committed to a whole school approach to safeguarding and promoting the welfare of children. All pupils have the right to be protected from all types of harm and abuse, and all our policies and procedures are intended to operate with the best interests of the pupils at their heart.
- 1.2 This Safeguarding and Child Protection Policy (“this Policy”) forms a fundamental part of our approach to providing excellent pastoral care to all pupils, including young people who may be over the age of 18 years.
- 1.3 Morocco does not currently operate a single statutory safeguarding and child protection framework. Instead, relevant legal provisions are distributed across civil, criminal, social protection, and education-related legislation. As a result, reporting pathways, inter-agency expectations, and institutional safeguarding standards are not yet codified into one nationally coordinated system.
- 1.4 Draft Law No. 29-24 is currently progressing through Parliament which will establish a National Agency for Child Protection and introduce a national child protection system. Once enacted and implemented, The BASM will operate within these statutory duties and protection standards ensuring continued compliance with Moroccan law and alignment with emerging national safeguarding standards.
- 1.5 This Policy and procedures set out arrangements to safeguard and promote the welfare of pupils at The BASM, ensuring compliance with current Moroccan legislation, whilst taking inspiration from the following UK statutory and non-statutory guidance: The Education Acts, Education (Independent Schools Standards) Regulations 2014 (as amended), The Independent School Standards Guidance for independent schools April 2019, Safeguarding Vulnerable Groups Act 2006, The Protection of Freedoms Act 2012, The Children Act 2004, What to do if you’re worried a Child is being Abused March 2015, Working Together to Safeguarding Children December 2023, Keeping Children Safe in Education 2025, Disqualification under the Childcare Act 2006 2018, Information Sharing, advice for practitioners providing safeguarding May 2024, DBS Referrals Guidance, Teacher misconduct: regulating the teaching profession March 2024 (and related guidance), Use of Reasonable Force in Schools July 2013, Preventing and Tackling Bullying 2017, Mental Health and Behaviour in Schools November 2018, Statutory Framework for the Early Years Foundation Stage (EYFS) September 2025, The use of social media for online radicalisation

July 2015, Teaching Online Safety in School January 2023, Sharing nudes and semi-nudes: advice for education settings working with children and young people UKCIS March 2024, Meeting digital and technology standards in schools and colleges March 2025, Working Together to Improve School Attendance (DfE, 2024), Behaviour in Schools guidance (DfE, 2024).

- 1.6 This Policy is addressed to all members of staff and volunteers at The BASM (temporary and permanent). The word 'Staff' is used within the policy to include volunteers.
- 1.7 Adherence to this Policy is mandatory for all staff and its use is not subject to discretion. This Policy applies whenever staff are working with pupils, including where this is away from the school site, for example at another institution, on school visits and trips, as well as sporting and cultural activities.
- 1.8 This policy should be read in conjunction with other school policies including Attendance, Behaviour, Anti-Bullying, Online Acceptable Use, Staff Code of Conduct, Risk Management, First Aid, Whistleblowing.
- 1.9 This policy is available on The BASM website. A paper copy is available upon request (in Arabic, French and English) from the School Reception office.

## 2. CREATING A CULTURE OF SAFEGUARDING

- 2.1 **Safeguarding** and **child protection** are related but distinct; the latter is a subset of the former. Children and young people are usually safeguarded through voluntary engagement with services such as General Doctors, (GPs), hospitals, housing support services, etc.
- 2.2 Section 30 of the Children Act 1989 is the cornerstone of modern safeguarding in the UK as it established that a **risk of "significant harm"** is the **threshold** for compulsory (**statutory**) **intervention** into family life.
- 2.3 "Harm" is defined as "the ill-treatment or impairment of health and development" including abuse, neglect, exploitation. It does not set absolute criteria for what constitutes significant harm.
- 2.4 UK schools have a statutory duty to refer cases to an external agency where there is reasonable cause to suspect significant harm under a **Section 17 (Child in Need)** or a **Section 47 (Child Protection)**.
- 2.5 A Section 17 applies if a child is vulnerable, unlikely to achieve or maintain satisfactory health or development or where development would be significantly impaired limiting, daily life. This includes children with long-term disabilities limiting daily life, or those affected by parental mental ill health, learning disability, substance abuse etc.
- 2.6 A Section 47 Child Protection assessment applies where there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. Local authorities have a statutory duty to act.
- 2.7 The BASM has adapted its safeguarding procedures to reflect the threshold of immediate significant harm within a context where there is no overarching external referral agency. In doing so, the fulfils its legal duties to protect pupils and staff from harm.
- 2.8 Our definition of safeguarding and promoting the welfare of children is adapted for the Moroccan context based on Working Together to Safeguard Children as:
  - 2.8.1 Providing help and support to meet the needs of children as soon as problems emerge.
  - 2.8.2 Protecting children from maltreatment, whether that is within or outside the home, including online.
  - 2.8.3 Preventing the impairment of children's mental and physical health or development.
  - 2.8.4 Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.

- 2.8.5 Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship arrangement, whenever possible and where this is in the best interests of the children.
- 2.9 There are four themes: **Prevention** e.g., active promotion of a safe school culture, curriculum, pastoral opportunities for pupils to fulfil their potential. **Protection** e.g., following agreed procedures, ensuring risks are mitigated, and all staff are suitably trained to respond appropriately to any wellbeing and safeguarding concerns. **Support** e.g., for all pupils, parents and staff, and where appropriate specific interactions for those who may be at risk of harm (considerations of language, culture, disability, history). **Collaboration** with parents, expert agencies, schools, and expert professionals in Morocco and the UK to ensure appropriate communications and actions are undertaken.

### 3. WHAT IS CHILD ABUSE?

- 3.1 A summary of the categories and definitions listed below are drawn from Keeping Children Safe in Education and Working Together to Safeguard Children.
- 3.2 Abuse is any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
- 3.3 Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- 3.4 Children may be abused by an adult or adults or another child or children. Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.
- 3.5 Additional guidance on each of these categories, including indicators and vulnerabilities is to be found in Annex 1.
- 3.6 **Physical** – a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms, or deliberately induces, illness in a child.
- 3.7 **Symptoms:** unexplained injuries/burns, untreated injuries, bruises/abrasion around the face, bi-lateral injuries e.g. two bruised eyes, bruising abrasions to lips, cheeks, outer ears.
- 3.8 **Emotional** – the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to 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 a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- 3.9 **Symptoms:** excessive overreaction to mistakes, continual self-deprecation, excessive rocking, thumb sucking, hair twisting, extreme compliance/aggression, drug, alcohol and substance misuse, significant peer relationship difficulties
- 3.10 **Sexual** - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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 the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- 3.11 **Symptoms:** inappropriate sexual awareness to child's age, provocative sexual behaviour, self-harm, pregnancy, sexually transmitted diseases, sudden changes in behaviour or school performance, fear of undressing for gym, avoids changing, physical activities, depression/withdrawal, drugs, alcohol, substance abuse
- 3.12 **Neglect** - the persistent failure to meet a child's basic physical and/or psychological needs likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because 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); ensure access to appropriate medical care or treatment; provide suitable education. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 3.13 **Symptoms;** Constant hunger, tiredness and/or poor personal hygiene, ill-fitting / dirty clothes, untreated medical problems, self-destructive tendencies, social isolation, poor self-esteem and/or relationship with peers, excessive rocking, hair twisting, thumb sucking, late in reaching developmental milestones e.g. speaking, walking, without a medical reason.

#### 4. SUBSETS OF ABUSE

- 4.1 **Child on child abuse including sexual violence and sexual harassment (SVSH).** Children can abuse other children, and that this must be addressed whether it occurs inside school, outside school or online.
- 4.2 SVSH can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 4.3 Child on child abuse is most likely to include, but is not limited to: bullying (including cyber, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse') physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence) sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party consensual and non-consensual

sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery), upskirting, which typically involves taking a picture under a person's clothing without their permission, and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse, or humiliation used as a way of initiating a person into a group and may also include an online element).

- 4.4 **Child sexual exploitation (CSE), child criminal exploitation (CCE)** occurs when 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 or criminal activity. (a) In exchange for something the victim needs or wants and / or (b) for the financial or other advantage of the perpetrator of the perpetrator or facilitator and / or through violence or the threat of violence.
- 4.5 **'Honour-based' Abuse (HBA)** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage, and practices such as breast ironing. **Female Genital Mutilation (FGM)** refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. FGM typically takes place between birth and around 15 years old; however, it is believed that most cases happen between the ages of 5 and 8. A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. All forms of HBA are abuse (regardless of the motivation).
- 4.6 **Domestic Abuse** is actual or threatened physical emotional psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse. Types of domestic abuse include intimate partner violence abuse by family members teenage relationship abuse and child adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse regardless of sexual identity, age, ethnicity socioeconomic status or background and domestic abuse can take place inside or outside the home.
- 4.7 **Online** abuse is linked with three key areas. **Conduct:** Children may be at risk because of their own behaviour e.g. by sharing too much information online with other people or leaving a digital footprint, which allows others to exploit them. **Content:** children can be contacted by bullies or people who groom or seek to abuse them. New friends made online may not be who they say they are. **Commercialism:** children can be unaware of hidden costs and advertising in apps games and websites.
- 4.8 **Sharing nude and semi-nude images** is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences are serious and put those involved at risk of serious harm. This can be via social media gaming platforms, chat apps or forums. The motivation for taking and sharing nude and semi-nude image videos and live streams are not always sexually or criminally motivated. However, the sharing of nudes and semi-nude images of Under 18-year-olds is a form of child abuse.
- 4.9 **Contextual safeguarding:** safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school. All staff should consider the context within which such incidents and/or behaviours occur. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## 5. INDICATORS OF ABUSE

- 5.1 All staff members should be aware of indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside school, inside and outside of home and online.
- 5.2 Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of children who may need help or protection.
- 5.3 The following may help staff to be aware of possible signs of abuse. However, the list is not exhaustive - if staff members are unsure, they should always seek advice, and report concerns even where signs/indicators are not present:
- 5.4 General
  - 5.4.1 Children whose behaviour changes, becoming aggressive, disruptive, withdrawn, clingy, difficulty sleeping, bed wetting.
  - 5.4.2 Avoids specific family members or friends, without an obvious reason.
  - 5.4.3 Talk about being left home alone, inappropriate careers, strangers.
  - 5.4.4 Shy away from being touched or flinch at sudden movements.
  - 5.4.5 Reluctant to go home after school.
  - 5.4.6 High unauthorized absence, poor punctuality, consistently late being picked up, A child missing or persistently absent from school is a potential indicator of abuse and neglect.
  - 5.4.7 Children who express concerns for younger siblings, or about older siblings without explaining why.
  - 5.4.8 Children who talk about running away
  - 5.4.9 Parents who are dismissive and non-responsive to concerns.
  - 5.4.10 Mental Health problems as indicators of (or a risk of) abuse neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

## 6. CHILDREN POTENTIALLY AT GREATER RISK OF HARM

- 6.1 We work in a trauma informed context, by which we mean, a child who is abused or is witness to violence may feel helpless and humiliated, blame themselves, find it difficult to develop and maintain a sense of self-worth.
- 6.2 The BASM may provide the only stability in the life of a child who has been abused or is at risk of harm. The behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 6.3 **Children with Special Educational Needs and Disabilities (SEND) or Physical Health issues or children for whom English is a second language.**
- 6.4 These children can face additional safeguarding challenges both online and offline, including vulnerability to child-on-child abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:
  - 6.4.1 Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
  - 6.4.2 Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, and disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
  - 6.4.3 Communication barriers and difficulties in managing or reporting these challenges; and
  - 6.4.4 Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

- 6.4.5 To address these additional challenges, such children may require extra pastoral support and attention, alongside any appropriate support for communication. Their additional vulnerabilities should also be carefully considered in situations where the use of reasonable force may be needed. Any reports of abuse involving children with SEND will require close liaison with the Designated Safeguarding Lead and Assistant Head (Inclusion and EAL)
- 6.5 Pupils who are questioning their sexuality (even though this is not an inherent risk factor for harm) whilst always maintaining compliance with Moroccan law.

## 7. ROLES AND RESPONSIBILITIES

- 7.1 The BASM has procedures which detail the roles and responsibilities of all staff in relation to safeguarding and child protection.
- 7.2 Safeguard and promoting the welfare of children is everyone's responsibility. Everyone who encounters children and their families has a role to play in safeguarding. Everyone who works with our pupils should make sure that their approach is always to consider what is in the best interests of the child.
- 7.3 The Headteacher is responsible for ensuring:
- 7.3.1. Safeguards procedures are in place not only to protect and promote the welfare of children but also to enhance the confidence of our staff and the public.
  - 7.3.2. Suitable arrangements are in place for the recruitment of staff and monitoring the SCR. See Staff Recruitment Policy.
  - 7.3.3. Effective oversight of the Complaints Policy, Low Level Concerns and Managing Allegations against staff
  - 7.3.4. The appointment of a **Designated Safeguarding Lead (DSL)** who will:
- 7.4 The Designated Safeguarding Lead will;**
- 7.4.1. Take lead responsibility for implementing the safeguarding and child protection policy effectively and efficiently.
  - 7.4.2. Ensure all staff understand their role in implementing the safeguarding child protection procedures by ensuring effective induction and regular update training appropriate to role, keeping an up-to-date itemised record of such training, including induction, and refresher updates.
  - 7.4.3. Lead staff induction to include The BASM Safeguarding and Child Protection Policy, reading Part 1/Annex A of KCSiE (Annex B for those in regulated activity), The Pupil Behaviour Rewards and Sanctions Policy, CPOMS training, KCSiE updates.
  - 7.4.4. Review of the Staff Code of Conduct & ICT Acceptable Use Agreement to ensure staff do not, place pupils at risk of harm, or themselves at risk from an allegation of harm, and ensure that any images taken of pupils are appropriate and stored and managed safely.
  - 7.4.5. Ensure all staff have a confident understanding of the identity and role of the Designated Safeguarding Lead(s) and Deputy Designated Safeguarding Lead(s).
  - 7.4.6. Know how to: report concerns about pupils, write up pupil disclosures, report allegations against staff and Low-Level Concerns.
  - 7.4.7. Act as a source of safeguarding advice and support within the School for staff, parents and pupils.
  - 7.4.8. Ensure the work of DDSLs is co-ordinated, along with the School Nurse, Assistant Head (Inclusion and EAL), Assistant Head Academic, Head of PHSE, Attendance Officer, IT Technician.
  - 7.4.9. Ensure close liaison with the Safeguarding Board Member and NE Chair.



- 7.4.10. Be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with the procedures and guidance within this policy.
- 7.4.11. Co-ordinate action in relation to both children and allegations against staff, referring cases of suspected abuse or allegations to the relevant local and international authorities including police, DBS, TRA et al.
- 7.4.12. Identify pupils who are at risk of and/or are likely to suffer significant harm and take appropriate action and promote the welfare of pupils in need of additional support.
- 7.4.13. Share information appropriately to keep children safe, including with the School Nurse and Assistant Head (Inclusion and EAL) so that any medical assessment carried out is complete.
- 7.4.14. Ensure awareness of the latest Moroccan and UK guidance and requirements and adapt policy and procedures accordingly.
- 7.4.15. Receive appropriate training in safeguarding and child protection matters to include both national and local bodies, at least every two years, and in addition to formal training, update their knowledge and skills at regular intervals and at least annually, to keep up with developments relevant to the role. Deputy DSLs will be trained to the same level as DSLs.
- 7.4.16. Take responsibility for online safety (as outlined in the online safety policy). Protect pupils and staff from online risks; these include online safety education and training, policies and procedures governing the use of IT, including effective filtering and monitoring procedures;
- 7.4.17. Ensure whole school use of CPOMS by all staff and quality assure reporting standards.
- 7.4.18. Encourage pupils to raise any concerns that they might have and ensures that these are taken seriously. We encourage pupils to contribute their own ideas, appropriate to their age and understanding, about how their safety and welfare could be further improved.
- 7.4.19. Promote safe practice and challenge poor and unsafe practice;
- 7.4.20. Deal with issues of confidentiality, information sharing and consent;
- 7.4.21. Ensuring that the names and contact details of the DSL, DDSLs & Safeguarding Board Member and NE Chair are clearly advertised around the school with a statement explaining the school's role managing safeguarding and child protection concerns and effectively communicated to all stakeholders.

## **8. RESPONDING TO SAFEGUARDING AND CHILD PROTECTION CONCERNS**

- 8.1. Staff are important as they can identify concerns early and provide help for children, to prevent concerns from escalating. Staff have a responsibility to identify children who may need extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.
- 8.2. Staff should not assume that a colleague or another professional will act and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.
- 8.3. If staff have concerns about a child (as opposed to a child being in immediate danger or at risk of harm) they will need to decide what action to take. All staff should be prepared to identify children who may benefit from early help, that is, support as soon as a problem emerges.
- 8.4. **Such concerns should be discussed with the Designated Safeguarding Lead (or in their absence a Deputy Designated Safeguarding Lead).**

- 8.5. Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:
- 8.5.1. Is a young carer, bereaved, experiencing serious illness within the family setting
  - 8.5.2. Is disabled, has certain health conditions, specific additional needs (SEND or Education, Health and Care Plan, mental health needs).
  - 8.5.3. Is missing education, persistently absent from school, not in receipt of full-time education.
  - 8.5.4. Has experienced multiple suspensions, is at risk of being permanently excluded from schools.
  - 8.5.5. Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
  - 8.5.6. Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups, county lines, or serious violence (including knife crime).
  - 8.5.7. Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
  - 8.5.8. Is at risk of being radicalised or exploited
  - 8.5.9. Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
  - 8.5.10. Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
  - 8.5.11. Is misusing alcohol and other drugs themselves
  - 8.5.12. Has a parent or carer in custody, or is affected by parental offending
  - 8.5.13. Is frequently missing/goes missing from home
  - 8.5.14. Is a privately fostered child

**8.5 If a member of staff believes that a concern reaches the immediate / significant harm threshold they must contact the Designated Safeguarding Lead immediately.**

## **9. RESPONDING TO DISCLOSURES**

- 9.1. The BASM recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 9.2. Children are more likely to be abused by someone they know and trust than by a stranger. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- 9.3. Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may feel embarrassed, humiliated, or threatened. **This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.**
- 9.4. If a disclosure is made by a pupil, the member of staff should:
- 9.4.1. immediately stop and listen to carefully to a child making a disclosure. Remember, of all the people they could have chosen to speak to they have chosen you.
  - 9.4.2. reassure the pupil that what they are saying is being taken seriously and without criticism.
  - 9.4.3. respond in a supportive, calm manner, avoiding asking detailed questions.
  - 9.4.4. listen, record and report; not to investigate.
  - 9.4.5. allow the pace of the conversation to be dictated by the pupil;
  - 9.4.6. ask open questions which encourage the pupil to talk such as "can you tell me what happened?"
  - 9.4.7. accept what the pupil says

- 9.4.8 acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously;
  - 9.4.9 note carefully any clearly visible external signs of possible injury or neglect.
  - 9.4.10 reassure the pupil that they have done the right thing, that it is not their fault.
  - 9.4.11 Tell the pupil sensitively, whom you have to tell (the Designated Safeguarding Lead) so that the child can be helped to stay safe and feel better.
  - 9.4.12 Consider language and cultural needs e.g. talking about sensitive subjects in a second language may make the experience for a pupil even more traumatic.
- 9.5. Staff should not:
- 9.5.1. give the impression that the child is creating a problem by reporting any form of abuse and/or neglect.
  - 9.5.2. burden the pupil with guilt e.g. "why didn't you tell me before?"
  - 9.5.3. make the child feel ashamed for making a report.
  - 9.5.4. interrogate or pressure the pupil to provide (additional) information;
  - 9.5.5. ask potentially leading questions e.g. "How many other times has this happened?"
  - 9.5.6. undress the child or examine clothed parts of the child's body to determine the nature of any such injuries/neglect;
  - 9.5.7. criticise the alleged perpetrator, this may be someone they love; promise confidentiality.
  - 9.5.8. make promises that they cannot keep such as "I'll stay with you all the time" or "it will be alright now";
  - 9.5.9. put words in the child's mouth (i.e. finish their sentences);
  - 9.5.10. jump to conclusions or speculate about what happened or might have happened, or make accusations;
  - 9.5.11. show an overly emotional reaction, such as expressing disgust, shock or disbelief;
  - 9.5.12. Investigate the incident, allegations, jump to conclusions; speculate or accuse anybody;
  - 9.5.13. Try to decide if the allegations are true or not.
  - 9.5.14. Give guarantees of confidentiality to the child (or keep any secrets from the school) but do give assurances only those who need to know will be informed.
  - 9.5.15. Overlook practises that are defined in this policy as abusive based on cultural sensitivity.
  - 9.5.16. Allow their behaviour and actions to place pupils or themselves at risk of harm.
- 9.6. If pupil reports abuse from another pupil or pupils, staff should follow the procedures in this section. All children involved, whether a potential perpetrator or victim, will be treated as being 'at risk'.
- 9.7. A bullying incident will be regarded as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. See the Anti Bullying Policy.

## 10. RECORDING INFORMATION

- 10.1 Staff may report a safeguarding **concern**, suspicion, observation about a child. A child may make a safeguarding **disclosure** to a staff member. In any case the same procedures apply.
- 10.2 Staff should:
- 10.2.1 Take brief notes using the exact words of the reporting person even if it is a child and they seem childish, rude, or inappropriate.
  - 10.2.2 Identify the key words in the language used by the pupil.
  - 10.2.3 Record the child's demeanour (non-verbal behaviour) e.g. crying, pulling their hair, tired, tapping feet, biting nails.

- 10.2.4 Record any observed injuries including bruises, cuts, burns.
- 10.2.5 Distinguish between fact, observation, allegation and opinion.
- 10.2.6 Consider any language barriers and whether additional support is required.
- 10.2.7 Ensure they add date, time, location and context at the time or as soon as possible afterwards. Sign and add a time / dated.

10.3 Staff should not

- 10.3.1. Try to translate or 'interpret' or make assumptions about what they think a child is trying to say.
- 10.3.2. When taking notes, sending emails, be aware of the potential for an accusation of bias e.g. a personal judgement about one parent vis-à-vis another, whether a child can be trusted to tell the truth. In all communications be professional in one's choice of words.
- 10.3.3. All concerns, discussions and decisions made and the reasons for those decisions should be uploaded onto CPOMS e.g. all meetings, handwritten notes, emails, summaries of telephone conversations. Whilst not strictly true, it is wise to be guided by the adage 'if there is no record, it didn't happen'.
- 10.3.4. All this information is potential evidence in criminal proceedings or disciplinary investigation. A child does not need to disclose again for the original disclosure to be used in such proceedings.
- 10.3.5. Staff who have become involved with a child who has suffered harm or appears to have suffered harm will be offered the opportunity to talk through any anxieties with the Designated Safeguarding Lead and to seek further support as appropriate.

## 11. REPORTING CONCERNS

- 11.1 **Report immediately to the Designated Safeguarding Lead (and no later than 24 hours) any disclosure and load notes onto CPOMS.** Unless the disclosure involves an allegation against a member of staff.
- 11.2 Where the disclosure identifies a safeguarding issue, the Designated Safeguarding Lead will report the disclosure to the Safeguarding Board Member, and / or NE Chair and or relevant external agencies within 24 hours.
- 11.3 In any case of immediate risk of serious harm to a child, and / or evidence to indicate a crime has been committed, the Designated Safeguarding Lead will contact the police and inform the Safeguarding Board Member and / or NE Chair.
- 11.4 Whilst the Designated Safeguarding Lead will usually decide whether to refer to the Safeguarding Board Member and / or the police, in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, anyone can do so. If a member of staff makes a referral independently, they must inform the Designated Safeguarding Lead within 24 hours.

## 12. ALLEGATIONS AGAINST STAFF

- 12.1 **If the concern, complaint, disclosure, allegation involves / is about:**
- 12.2 **A member of staff, including the Designated Safeguarding Lead it must be reported immediately to the Headteacher.**
- 12.3 **The Headteacher or if there is a conflict of interest in reporting to the Headteacher it should be reported immediately to the Safeguarding Board Member, NE Chair or Proprietor without informing the Headteacher.**

- 12.4 The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation.
- 12.5 The decision as to whether to suspend any member of staff, including the Headteacher is taken by the proprietor, after legal advice and guidance from the Safeguarding Board Member and NE Chair.
- 12.6 The School will refer to the Disclosure and Barring Service (DBS) or its equivalent anyone who has harmed, or poses a risk of harm, to a child, as outlined. See Annex 1.
- 12.7 All allegations involving staff will be discussed with the Safeguarding Board Member and external agency if practical before any investigation takes place.
- 12.8 Communications with the School community about safeguarding-related allegations shall only be made following consultation with the Safeguarding Board Member, NE Chair and proprietor. Every effort will be made to maintain confidentiality for all parties and guard against unwanted publicity.
- 12.9 If there has been a substantiated allegation against any member of staff the School will work with the relevant authorities to determine the next steps to be taken regarding the individual as well as whether there are any improvements to be made to the BASM's procedures or practice to help prevent similar events in the future.

### **13. LOW LEVEL CONCERNS (LLC)**

- 13.1 A low-level concern about the behaviour of a member of staff is one where such behaviour would not meet the 'harm threshold' in the UK and yet appears to be inconsistent with the staff code of conduct or personal / professional boundaries e.g. being over friendly with children and or having 'favourite' pupils; taking photographs of children or sending them text messages using private technology; engaging with a child on a one-to-one meeting in a secluded area or behind a closed door; using sexualized, intimidating or offensive language within the school setting, or on social media contrary to the staff code of conduct; exhibiting signs of anxiety, mental health concerns which may present a risk to children.
- 13.2 LLCs about a member of staff may be shared initially with the Designated Safeguarding Lead or the Headteacher as soon as is reasonably possible. If the former, the Designated Safeguarding Lead should inform the Headteacher of any concern in a timely manner.
- 13.3 Low-level concerns about the Headteacher should be reported to the Safeguarding Board Member or NE Chair.
- 13.4 This will maintain an open and transparent culture within the School, reinforcing its ethos and values; ensure that adults working in the School act within professional boundaries; and enable concerning, problematic or inappropriate behaviour to be identified and addressed early, minimising the risk of abuse, and often support the colleague concerned.
- 13.5 The Headteacher (or a nominated deputy) will investigate the LLC, speaking to the person who raised the concern, the individual involved, and any witnesses. The evaluation of the concern should only be undertaken in consultation with the Safeguarding Board Member or NE Chair.
- 13.6 The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.
- 13.7 The Headteacher must record all LLCs in writing, including details of:
  - 13.7.1. The concern,
  - 13.7.2. The context of the report

- 13.7.3. The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible);
- 13.7.4. Action taken and the rationale for this.
- 13.8 They must remain confidential, secure, separate from the main personnel records and be retained at least until the individual leaves their employment.
- 13.9 Records of LLCs must be reviewed periodically to identify any patterns of concerning, problematic or inappropriate behaviour. Should a pattern of behaviour be identified, the School will decide on a course of action depending on the nature of the concerns. The review of records will also consider whether these indicate any wider cultural issues in the School which should be addressed by revising school policies or providing further training.
- 13.10 Staff should self-report if they do something, which could either be misinterpreted, or might appear compromising to another person observing, and or if they know they have behaved in a way which runs contrary to the staff Code of Conduct. By self-reporting a member of staff may pre-empt a concern and protect themselves from unwarranted allegation.

#### **14. CONSENT, SHARING INFORMATION WITH EXTERNAL SERVICES**

- 14.1 As there is no single statutory safeguarding framework equivalent to a UK Local Safeguarding Children's Partnership, referrals cannot be made to a single external body. Safeguarding responsibilities arise from a range of civil, criminal, social protection, and education-related legislation and guidance. The School will nonetheless seek to establish appropriate links with relevant external services.
- 14.2 Decisions to make a referral are serious and require professional judgment. They should normally be taken by the Designated Safeguarding Lead (DSL), in liaison with the Headteacher and following consultation with the Safeguarding Board Member and/or Non-Executive Chair. Where serious harm is suspected, or a crime may have been committed, the police will be informed.
- 14.3 The School has age-appropriate systems enabling pupils to express their views, which will be considered when determining action. However, a child's wishes cannot override the duty to refer suspected abuse to local agencies or the police.
- 14.4 Parents should normally be informed. Where a child is assessed as competent, their wishes regarding information sharing with parents should be respected, including where they wish to limit or withhold information, unless sharing without consent is required to prevent risk of harm.
- 14.5 Where a child is not competent, parental consent should normally be sought unless this is not possible, not reasonable, or would place the child at risk. Information may be shared without consent where there is a clear safeguarding need. Advice should be sought from the Safeguarding Board Member and/or Non-Executive Chair.
- 14.6 Information sharing is solely to ensure a pupil receives appropriate help and protection and must be limited to a strict need-to-know basis, as determined by the DSL or Headteacher and in the child's best interests. Decisions relating to consent and information sharing must be recorded. Further guidance is set out in Annex 1.
- 14.7 Any report of rape, assault by penetration, or sexual assault must be referred to the police. The starting principle of police referral applies even where the alleged perpetrator is under the age of criminal responsibility.
- 14.8 For pupils aged 18 or over, safeguarding concerns are considered in relation to their own welfare and that of others, particularly children, and may require referral to the Safeguarding Board Member, Non-Executive Chair and/or local agencies, including the police.
- 14.9 Concerns relating to radicalisation must be discussed by the DSL and/or Headteacher with the Safeguarding Board Member and/or Non-Executive Chair prior to referral to the police.

- 14.10 The School will support pupils who disclose abuse by maintaining a safe and caring environment and promoting self-esteem and resilience, acting in accordance with relevant guidance to ensure legal processes are not compromised.
- 14.11 All safeguarding-related contacts must be recorded on CPOMS, including names, dates, times, and outcomes, with supporting emails, letters, and notes uploaded to maintain a clear chronology.

## **15. DUTY TO REPORT CONCERNS ABOUT THE MANAGEMENT OF SAFEGUARDING**

- 15.1 The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Staff should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and feel confident that such concerns will be taken seriously by the senior leadership team. The duty to report concerns about the management of safeguarding is part of the Code of Conduct and will also be reflected in staff training.
- 15.2 Where staff reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns.
- 15.3 The member of staff should bring their concerns to the attention of the Designated Safeguarding Lead, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Lead, to the Headteacher. The Headteacher will consult with the Safeguarding Board Member and or NE Chair to determine in the matter should be investigated as a safeguarding issue. Any actions taken will be reported back to the member of staff as appropriate.
- 15.4 However, where someone reasonably believes these reporting routes to be inappropriate or has reported concerns and no action has been taken, they should contact the proprietor who will investigate the concern as a serious safeguarding issue and report action taken back to the member of staff as appropriate.


## **16. MONITORING AND REVIEW**

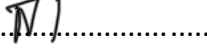
- 16.1 The working of this Policy will be monitored locally by the Designated Safeguarding Lead who will report as required to the Headteacher. The proprietor of The BASM, undertakes an annual audit visit and other periodic checks to monitor the effectiveness of the School's implementation of this policy and procedures, together with a review of the safeguarding incidents that have arisen and how they were managed.
- 16.2 This policy was last reviewed and updated on January 27<sup>th</sup>, 2026, and will be reviewed again in the event of any significant changes or by September 2026 at the latest.

## **17. KEY CONTACTS**

James Jarrett January 2026

### **SIGNED BY: HEAD**

Head's Signature.......... January 2026

Advisory Board Member's Signature..........

NEXT REVIEW DATE: September 2026

