

Policy Review Programme	Annual
Policy created by Dawn Griffiths, Director of Bespoke Learning Ltd and DSL	Effective from 30.08.2019
Review dates	<p>27.04.2020 - Revised with reference to teachers 'Information for Safeguarding leaflet'.</p> <p>04.01.2021 - Revised and updated with new Lado details.</p> <p>26.12.2021-Updated with new BCP Lado phone number, addition of new BCP website address 'How to report a concern'. Revision of Confidentiality section regarding parent/carer/responsible adult disclosure. Revision of Personal Safety guidelines for teachers regarding teachers not taking a young person's mobile phone number and ensuring their number is hidden if calling from their home landline. Reference to mental health.</p> <p>05.09.2022 – Change of title to include the words 'child protection'. Signposts to KCSIE 2022, reference to storage and sharing information about children and young people. Reference to sharing Pan-Dorset Safeguarding Children's Newsletter. Addition of Internet Safety.</p> <p>11.09.22 -Child-on-child abuse, advice on sexual violence and sexual harassment, communicating with parents regarding online safety, human rights and equality legislation and reporting and managing low level concerns.</p> <p>23.04.23- Reference to Bespoke Learning Ltd.'s Lone Worker Policy</p> <p>10.09.23 – Policy updated to include all the updates to KCSIE 1st September 2023</p> <p>04.09.24 -2 new bullet points have been added to the definition of safeguarding in line with KCSIE update Sept 2024.</p> <p>Update to 1. Legal Framework. 2. Roles and responsibility (record keeping). 4. Early Help 5. Abuse, neglect and exploitation 13. Addition of an Alternative Provision statement. 18. Communication and Confidentiality.</p> <p>31.08.25 -Legal framework: revised and updated with new online 'filtering and monitoring standards and 'meeting digital and technology standards DFE (2025). Eight amendments to 'Roles and responsibilities' for the Director of Bespoke Learning Ltd. in line with KCSIE 2025. Addition of reference to Bespoke Learning's online safety policy.</p>

	<p>5. Abuse, neglect and exploitation. Amendments to the first three paragraphs in line with KCSIE 2025/</p> <p>11. Pupils potentially at greater risk of harm-Home educated children. Updated in line with the School Attendance (Pupil Registration) (England) Regulations of 2024 14 and 16, front cover. Concerns- addition of The Family Support and Advice Line contact details.</p> <p>24. Monitoring and review. Addition of the last 2 paragraphs. In line with KCSIE 2025.</p> <p>18.12.25 Addition of Equalities Statement. Amendment to Statement of Intent to Overall Aims. The inclusion of the forthcoming Government guidance on gender questioning children (signposting to be published).</p> <p>3. 21.12.25 Multi-agency working. Addition of Referral Pathway flowchart.</p> <p>Training- inclusion of DSL's training Statement regarding Bespoke Learning Ltd. operating as a sole trader business in safer recruitment, SCR.</p> <p>Appendix -Inclusion of BCP flow chart, 'Concerns about a child' and Reporting a low level concern form- Dorset.</p>
Next review scheduled for	01.09.2026
Person with responsibility for review	Dawn Griffiths, Director of Bespoke Learning LTD. and DSL.

Bespoke Learning Ltd



Child Protection and Safeguarding Policy

The DfE has updated its statutory guidance on '[Keeping children safe in education](#)'. The 2025 version of the guidance comes into force on 1 September 2025. This policy has been revised in line with the updated guidance.

As the sole practitioner at Bespoke Learning Ltd, I, Dawn Griffiths complete annual safeguarding and child protection refresher training, including online safety, through formal training and ongoing professional updates such as e-bulletins and sector briefings.

If you are worried or concerned about a child's welfare or worried they are being abused, you can make a referral to Children's Social Care. Please see below for the contact details for Dorset Council and Bournemouth, Christchurch and Poole.

Bournemouth, Christchurch & Poole – Children's First Response Hub: 01202 123334

Email: childrensfirstresponse@bcpcouncil.gov.uk

In an emergency, or out of hours contact:

Bournemouth, Christchurch & Poole Out of Hours Service: 01202 738256

Email: childrensOOHS@bcpcouncil.gov.uk

Police non-emergency: 101

Police Emergency: 999

Dorset – Family Support and Advice Line: 01305 228558 (including out of hours)

In an emergency, or out of hours contact: 01305 228558

Police non-emergency: 101

Police Emergency: 999

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(a)Overall Aims

The overarching aim of Bespoke Learning Ltd.'s safeguarding policy is to ensure that every child and young person taught receives education in a safe, supportive, and protective environment. As a sole-director led organisation, the responsibility for safeguarding rests directly with the Director, Teacher, and Designated Safeguarding Lead, Dawn Griffiths.

This policy will contribute to the safeguarding of children Bespoke Learning Ltd. by:

- Clarifying safeguarding expectations for members of the education setting's community, staff, governing body, children, and their families.
- Establishing clear procedures: Maintaining transparent processes for reporting, recording, and escalating safeguarding issues.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture built on shared values; and that our children are treated with respect and dignity, taught to treat staff with respect, feel safe, have a voice, and are listened to.
- The early identification of need for vulnerable children and provision of proportionate interventions to promote their welfare and safety.
- Promoting welfare and well-being: Supporting learners' physical, emotional, and mental health so they can thrive.
- Providing safe learning environments: Ensuring community spaces used for teaching are risk-assessed, accessible, and appropriate.
- Raising awareness of safeguarding responsibilities: Embedding a culture where learners, families, and partners understand how to recognise and report concerns.
- Working in partnership: Collaborating with families, commissioners, schools, health services, and local authorities to protect learners.
- Promoting equality and inclusion: Recognising diversity and addressing the needs of vulnerable groups, including those with SEND and communication differences.
- Committing to continuous improvement: Reviewing safeguarding practice regularly to reflect legislation, guidance, and best practice.

Through these aims, Bespoke Learning Ltd seeks to remove barriers to learning, build resilience, and ensure that every learner is supported to achieve their potential in a safe and nurturing environment in compliance with the Children Act 1989, the Education Act 2002, and Working Together to Safeguard Children guidance.

Dawn Griffiths, Director and DSL of Bespoke Learning Ltd. is committed to the fact that safeguarding children and young people is everyone's responsibility. To fulfil this responsibility effectively all professionals should make sure their approach is child centred.

(b) Acronyms and Definitions

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school or an education establishment.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school or an education establishment.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.

HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent staff.

Definitions

The terms '**children**' and '**child**' refer to anyone under the age of 18.

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children 2023 as:

- Protecting students from maltreatment.
- Preventing the impairment of students' mental and physical health or development.
- Ensuring that students grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all students to have the best outcomes.
- Providing help and support to meet the needs of children as soon as problems emerge.
- safeguarding means to protect children from maltreatment, whether that is within or outside the home, including online.

Child protection is part of safeguarding and promoting the welfare of children and is defined in the Children Act 1989 (s.47) as when a child is suffering or is likely to suffer significant harm. Under statutory guidance and legislation action must be taken to safeguard and promote the child's welfare.

Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact on children and families' lives.

For the purposes of this policy, '**consent**' is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, '**sexual violence**' refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **‘sexual harassment’** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a student’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.
 - Online safety policy.

For the purposes of this policy, **‘upskirting’** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including students and teachers, of any gender can be a victim of upskirting.

For the purposes of this policy, the **‘consensual and non-consensual sharing of nude and semi-nude images and/or videos’**, colloquially known as **‘sexting’**, is defined as the sharing between students of sexually explicit content, including indecent imagery. For the purposes of this policy, **‘indecent imagery’** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

For the purposes of this policy, **‘abuse’** is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology

may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, '**physical abuse**' is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, '**emotional abuse**' is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, '**sexual abuse**' is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, '**neglect**' is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

(c) Equalities Statement

Bespoke Learning Ltd is committed to promoting equality, diversity, and inclusion in all aspects of its work. As a sole, director led organisation, under the leadership of Dawn Griffiths (Director, Teacher, and Designated Safeguarding Lead), the company provides bespoke 1:1 education for young people who cannot attend mainstream school due to a variety of reasons, including health, social, emotional, or special educational needs.

Bespoke Learning Ltd.'s Commitment

- Equal access to education: Every learner is entitled to high-quality, personalised teaching, regardless of background, identity, or circumstance.
- Respect and dignity: Learners are treated with fairness, compassion, and respect, ensuring their voices are heard and valued.
- Inclusive practice: Teaching methods are adapted to meet diverse needs, including SEND, neurodiversity, and communication differences.
- Safe learning environments: Community spaces are chosen to ensure accessibility, safety, and comfort for all learners.
- Anti-discrimination: Bespoke Learning Ltd actively challenges prejudice, discrimination, and barriers to participation.
- Continuous improvement: Policies and practices are regularly reviewed to reflect evolving equalities legislation and best practice.

Legal and Policy Framework

In fulfilling its safeguarding and equalities responsibilities, Bespoke Learning Ltd. will always consider:

- Our duties under the Equality Act 2010, including recognition of protected characteristics.
- Our general and specific duties under the Public Sector Equality Duty.
- The forthcoming Government guidance on gender questioning children (signposting to be published).
- The considerations explained by the Equality and Human Rights Commission (April 2024).
- The interim update on the practical implications of the UK Supreme Court judgment, as outlined by the EHRC.

Responsibilities

- As sole Director and DSL, Dawn Griffiths holds direct accountability for embedding equality principles across all operations, safeguarding practice, and curriculum delivery.
- Bespoke Learning Ltd ensures compliance with statutory duties and integrates new guidance into practice as it emerges.

- Partnerships with families, commissioners, and community organisations are built on transparency, collaboration, and respect for diversity.

Outcomes

Through this commitment, Bespoke Learning Ltd aims to:

- Remove barriers to learning and participation.
- Promote confidence, independence, and resilience in learners.
- Celebrate diversity as a strength within the learning community.
- Model inclusive values that prepare young people for positive reintegration into education, training, or employment.

1. Legal framework

All action taken by Bespoke Learning Ltd. will be in accordance with current legislation and guidance. The following safeguarding legislation and guidance has been considered when drafting this policy:

- [The Education \(Independent School Standards\) \(England\) Regulations 2003](#)
- [The Safeguarding Vulnerable Groups Act 2006](#)
- [Teachers' Standards \(Guidance for school leaders, school staff and governing bodies\)](#)
- [Working Together to Safeguard Children](#)
- [Keeping Children Safe in Education](#)
- [Information Sharing 2024](#)
- [What to do if you're worried a child is being abused](#)
- [Filtering and monitoring standards in schools and colleges \(DfE\)](#)
- [Generative AI: product safety expectations - GOV.UK](#)
- Local Guidance from the Local Safeguarding Children Partnership (Pan -Dorset/ BCP Safeguarding Children Partnership) <https://pdscp.co.uk/bcp/> <https://pdscp.co.uk/>

In addition the following safeguarding legislation and guidance has been considered when drafting this policy:

Legislation

- Children Act 1989
- The Education Act 2002
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Working Together to Safeguard Children'

- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2025) 'Keeping children safe in education 2025'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2025) 'Filtering and monitoring standards for schools and colleges'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2025) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'

This policy operates in conjunction with the following Bespoke Learning Ltd. policies:

- Lone worker policy
- Whistleblowing policy
- Allegations management policy
- Safer Recruitment Policy
- Teachers Code of Conduct
- Student Code of Conduct policy
- Online safety policy
- Prevent duty policy
- Online safety policy
- Health and Safety policy
- Policy for Transporting students
- Low Level Concern Policy (Defining, responding and reporting low level concerns) (addendum to Safeguarding and Child Protection Policy) 2025-2026
- Safeguarding concern report form
- LGBT+ policy
- Equality and Diversity policy

2. Roles and responsibilities

Role of the Director of Bespoke Learning Ltd who operates as a sole trader Model

(Equivalent to Governing Body Responsibilities)

Bespoke Learning Ltd is a sole-trader-operated Alternative Education Provider. As the proprietor, the senior lead for safeguarding, and the Designated Safeguarding Lead (DSL), the Director, Dawn Griffiths, holds full responsibility for ensuring that safeguarding and child protection practice, processes, and policies (including online safety) are effective and compliant with legislation, statutory guidance, and Local Safeguarding Partnership arrangements.

The Director will:

- Ensure effective safeguarding governance: Oversee all safeguarding and child protection arrangements, ensuring compliance with *Keeping Children Safe in Education* (DfE 2025), Working Together to Safeguard Children, and local partnership procedures.
- Complete statutory audits: Produce the annual safeguarding report and complete the S175/157 safeguarding audit required by BCP Council (or Dorset Council where applicable) and ensure that any actions identified are addressed without delay.
- Maintain and update safeguarding policies: Review and update this safeguarding policy annually, or sooner if significant changes in legislation or guidance occur.
- Ensure DSL capacity and resources: Ensure that the DSL role (held by the Director, Dawn Griffiths) has sufficient time, training, and resources to fulfil all statutory responsibilities effectively.
- Undertake appropriate safeguarding training: Complete safeguarding and child protection training, including online safety, in line with the P-DSCP / BCP Safeguarding Children Partnership training pathway, and ensure learning is embedded across practice.
- Bespoke Learning Ltd does not currently employ additional staff. However, should the Director recruit staff, volunteers, contractors, or supply tutors in the future, all recruitment, vetting, and pre-employment checks will be carried out in full accordance with *Keeping Children Safe in Education* (DfE 2025, Part 3). This includes ensuring that only individuals who are suitable to work with children are engaged by the organisation.
- Manage allegations and concerns: Ensure that procedures are in place to manage safeguarding concerns or allegations against any adult working with children on behalf of Bespoke Learning Ltd.
- Promote pupil voice: Ensure that children have safe, accessible ways to express concerns, share their views, and provide feedback about their learning and wellbeing.

- Prevent and respond to child-on-child harm: Maintain systems to prevent, identify, and respond to child-on-child harm (including sexual abuse, sexual harassment, and online harm), and ensure online safety, filtering, and monitoring arrangements are proportionate and effective.
- Promote the education of children in care: Act as the designated teacher equivalent, working with Virtual Schools to promote the educational achievement of children in care and those with care experience.
- Review online safety systems: Ensure that filtering and monitoring systems are appropriate to the age, needs, and digital access of learners, and review their effectiveness regularly.
- Ensure staff training compliance: Bespoke Learning Ltd does not currently employ additional staff, these requirements will apply to all individuals engaged by the organisation should recruitment take place in the future, ensuring consistent compliance with statutory guidance and effective safeguarding practice. As the sole practitioner at Bespoke Learning Ltd, I, Dawn Griffiths complete annual safeguarding and child protection refresher training, including online safety, through formal training and ongoing professional updates such as e-bulletins and sector briefings.

All teachers and other professionals working with children have a responsibility to:

- Consider, always, what is in the best interests of the student.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which students can learn.
- Be prepared to identify students who may benefit from early help.
- Be aware of Bespoke Learning Ltd.'s systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL .
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local [early help](#) process and understand their role in it.
- Be aware of, and understand, the process for making referrals to [Child criminal exploitation](#) (CCE) , as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to Children's social care services (CSCS) and/or the police immediately, if at any point there is a **risk of immediate serious harm** to a student, otherwise report it to the DSL immediately and without delay.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.

- Be aware that a student may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Victims of harm should **never** be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put students at risk of harm.
- Be aware of behaviours that could potentially be a sign that a student may be at risk of harm.

Teachers, including the Director, have a responsibility to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The Director has a duty to:

- Take strategic leadership responsibility for Bespoke Learning Ltd.'s safeguarding arrangements.
- Ensure that Bespoke Learning Ltd. complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities at Bespoke Learning Ltd. are effective and comply with the law at all times.
- Guarantee that Bespoke Learning Ltd. contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Confirm that the Bespoke Learning Ltd.'s safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in Bespoke Learning Ltd.'s policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that teachers read at least Part one of KCSIE.
- Ensure that mechanisms are in place to assist teachers to understand and discharge their role and responsibilities regarding safeguarding children.
- Ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the student's wishes and feelings are considered when determining what action to take and what services to provide.
- Ensure systems are in place so that students can confidently report abuse, knowing that their concerns will be treated seriously. Ensure that systems are easily accessible.

- Ensure that teachers have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all teachers are aware of Bespoke Learning Ltd.'s local safeguarding arrangements.
- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities.
- Adhere to statutory responsibilities by conducting pre-employment checks on teachers who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that teachers are appropriately trained to support students to be themselves when working with Bespoke Learning Ltd., e.g. if they are LGBTQ+.
- Ensure Bespoke Learning Ltd. has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all teachers receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against teachers.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of teachers.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for students to express their views and give feedback.
- Establish an early help procedure and ensure all teachers understand the procedure and their role in it.
- Make sure that teachers have the skills, knowledge and understanding necessary to keep LAC safe, particularly regarding the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Create a culture where teachers are confident to challenge the Director over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by teachers.
- Provide teachers with the appropriate policies and information upon induction.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at Bespoke Learning Ltd. This includes:
 - Ensuring that teachers know which students have or had a social worker.
 - Understanding the academic progress and attainment of these students.
 - Maintaining a culture of high aspirations for these students.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these students reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these students are experiencing with teachers.

Details of Bespoke Learning Ltd.'s DSL can be found at www.bespokelearningltd.com

- If a child is in danger telephone 999 for the Police.

The DSL of Bespoke Learning Ltd. is the Director, Dawn Griffiths who undertakes lead responsibility for safeguarding and child protection within the setting.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to teachers on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other teachers to do so.
- Contribute to the assessment of children, and/or support other teachers to do so.
- During term time, be available during school hours for teachers to discuss any safeguarding concerns face-to-face, or in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Refer cases:
 - to Children's social care services –(CSCS) where abuse and neglect are suspected and support teachers who make referrals to CSCS.
 - to the Channel programme where radicalisation concerns arise, and support teachers who make referrals to the Channel programme.
 - to the DBS where a teacher is dismissed or has left due to harm, or risk of harm, to a child.
 - to the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice, and expertise for all teachers.

- Act as a point of contact with the safeguarding partners.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning teachers.
- Liaise with teachers on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with teachers when deciding whether to make a referral by liaising with relevant agencies so that student's needs are considered holistically.
- Liaise with external services, e.g. Therapists, Educational psychologists, mental health services et al where available, to provide a joined-up service.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a student's child protection file is made available to Bespoke Learning Ltd. as soon as possible, and consider any additional information that should be shared.
- Ensure the secure transfer of the Child Protection File when a child moves to a new setting-within 5 days for in year transfer or the first 5 days of the start of a new term.
- Take lead responsibility for understanding the filtering and monitoring systems and processes in place.
- Ensure each teacher has access to and understands Bespoke Learning Ltd.'s Child Protection and Safeguarding Policy and procedures – this is discussed during a teacher's induction process.
- Ensure Bespoke Learning Ltd.'s Child Protection and Safeguarding Policy is available publicly, and parents are aware that Bespoke Learning Ltd. may make referrals for suspected cases of abuse or neglect, as well as the role Bespoke Learning Ltd. plays in these referrals.
- Link with safeguarding partner arrangements to make sure that teachers are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to students and taking account of their wishes and feelings; this includes understanding the difficulties students may have in approaching teachers about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise teachers and help them feel confident on welfare, safeguarding and child protection matters. Specifically, to ensure that teachers are supported during the referrals processes; and to support teachers to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

- to promote the educational achievement of LAC and Previously looked after children, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- Ensure that the policies and procedures adopted by the Dawn Griffiths, Director of Bespoke Learning Ltd., particularly concerning referrals of cases of suspected abuse and neglect, are followed by teachers.
- Ensure that staff implement appropriate filters and monitoring of online material.
- Ensure that Bespoke Learning Ltd. practises safe recruitment in checking the suitability of teachers to work with children in accordance with the guidance in Keeping Children Safe in Education and the Education (Independent School Standards) (England) Regulations 2014 as amended.
- Ensure that, where the Bespoke Learning Ltd. ceases to use the services of any person because that person was considered unsuitable to work with children, a prompt and detailed report is made to the DBS within one month.

3. Multi-agency working

Bespoke Learning Ltd. will work together with appropriate agencies to safeguard and promote the welfare of children, including identifying and responding to their needs. This follows statutory guidance [Working Together to Safeguard Children 2023](#).

Occasions that warrant a statutory assessment under the Children Act 1989:

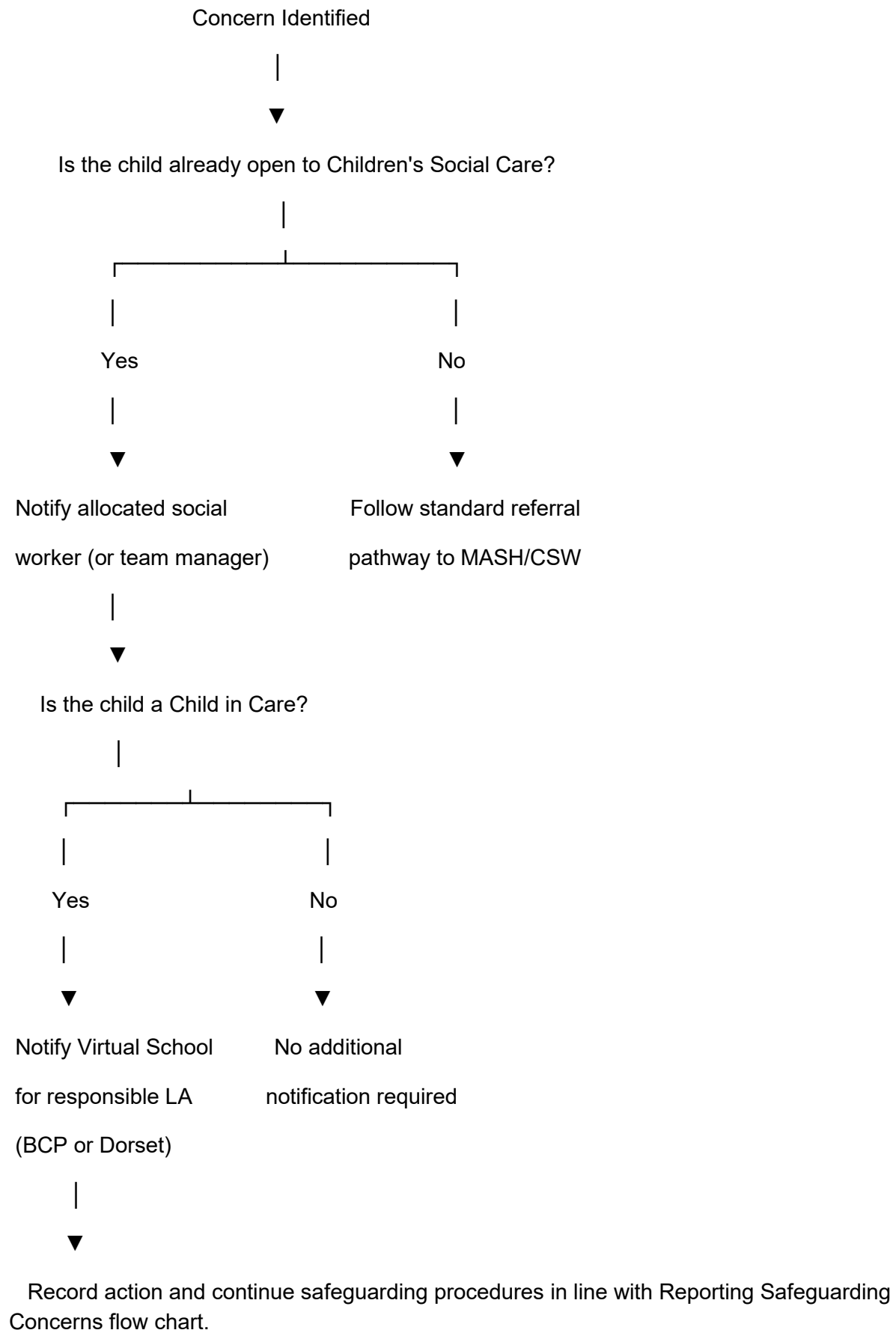
- If the child is in need under section 17 of the Children Act 1989 (including when a child is a young carer and or subject to a private fostering arrangement).
- Or if the child needs protection under section 47 of the Children Act 1989 where they are experiencing significant harm, or likely to experience significant harm.

Referrals in these cases should be made by the DSL to Children's Social Care in the Local Authority in which that child resides.

Where the child already has a social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager.

If the child is a child in care, notification should also be made to BCP Council's Virtual School or for children in care under Dorset Council, notification should be made to Dorset Council's Virtual School for Children in Care. This ensures the Virtual School is aware of any safeguarding concerns or statutory assessments that may impact the child's education, placement stability, or Personal Education Plan (PEP) cycle.

Referral Pathway Flowchart



Bespoke Learning Ltd. will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes providing written reports and ensuring representation at inter-agency meetings such as integrated support plan meetings, initial and review child protection conferences and core group meetings.

Once Bespoke Learning Ltd. is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. Bespoke Learning Ltd. will work with CSCS, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to multi-agency plans to provide additional support.

Bespoke Learning Ltd. also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE) and in situations such as:

- Where a child and/or their family is subject to an inter-agency child protection plan or a multiagency risk assessment conference (MARAC) meeting, we will contribute to the preparation, implementation, and review of the plan as appropriate.
- Where a child in care may be put on to part time timetable, we will consult with relevant agencies and the Virtual School.
- If a crime has been suspected or committed that involved the bringing of an offensive weapon to their provision session, then Dawn Griffiths, DSL, will liaise with the Police who will consider a proportionate response.
- If there is a risk of harm, the police will be called via 999.

For other concerns, or if Dawn Griffiths reports intelligence (or information) to the Dorset police via the link below. [What is police intelligence? | Dorset Police](#)

Dawn Griffiths, DSL, will always refer to the non-statutory guidance [when-to-call-the-police--guidance-for-schools-and-colleges.pdf \(npcc.police.uk\)](#) if unsure and will contact the local PCSO/ BCP Neighbourhood Team (Safer Schools Community Team).

In the rare event that a child death occurs, or a child is seriously harmed, **Dawn Griffiths, Director and DSL of Bespoke Learning Ltd.** will notify the P-DSCP/ BCP Safeguarding Children's Partnership as soon as is reasonably possible.

Information sharing

Bespoke Learning Ltd. recognises the importance of proactive information sharing between professionals and local agencies to effectively meet students' needs and identify any need for early help.

Considering the above, teachers will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

Teachers will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students. If teachers are in doubt about sharing information, they will speak to the DSL, Dawn Griffiths.

4. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any student may benefit from early help, but in particular, teachers will be alert to the potential need for early help for students who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of honour-based abuse and violence (HBA), such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of day.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

Bespoke Learning Ltd. will not limit its support to students affected by the above and will be mindful of a variety of additional circumstances in which students may benefit from early help, for example, if they are:

- Bereaved
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from Bespoke Learning Ltd., or not in receipt of full-time education.

Teachers of Bespoke Learning Ltd. will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The [local early help process](#) will be followed as required.

Teachers may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

5. Abuse and neglect

Teachers will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school or inside and outside of Bespoke Learning Ltd., or in an institutional or community setting by those known to them or by others, and online. Teachers will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

Teachers will recognise that abuse or neglect of a child may occur through the infliction of harm or through the failure to act to prevent harm. will understand that harm can include ill treatment that is not physical in nature, as well as the psychological impact of witnessing the ill treatment of others.

Teachers will pay particular attention to the effects of domestic abuse on children, recognising that harm may arise not only when children are directly involved, but also when they see, hear, or otherwise experience its consequences. All necessary steps will be taken to identify and respond appropriately to such concerns in order to safeguard and promote the welfare of all pupils.

Teachers will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. They will understand that, in most cases, multiple issues will overlap one another; therefore, teachers will be vigilant and always raise concerns with the DSL.

Teachers, especially the DSL, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside Bespoke Learning Ltd and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms). Teachers will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

Teachers will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

6. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – teachers will be aware of these issues.

[Appendix 1](#) of this policy sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual issues.

7. Child-on-child abuse

For the purposes of this policy, “**child-on-child abuse**” is defined as abuse between children.

Bespoke Learning Ltd. provides 1:1 teaching so students do not work in an environment where there are other children or young people. Therefore, there is never an opportunity for child-on-child abuse in the day of a student working with Bespoke Learning Ltd. However, in the highly unlikely event of a Bespoke Learning Ltd. student meeting another student they may know and abuse occurs, teachers have a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy’s [statement of intent](#).

Teachers will be aware that child-on-child abuse can occur between students of any age and gender, outside of Bespoke Learning Ltd., as well as online. (Bespoke Learning teaches students 1:1) All teachers will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond if it is reported to them. All teachers will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. Teachers will speak to the DSL if they have any concerns about child-on-child abuse.

Teachers will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can 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.

Teachers will be clear as to Bespoke Learning Ltd.’s policy and procedures regarding child-on-child abuse and the role they have to play in reporting it if a child reports it to them. They must respond where they believe a child may be at risk from it.

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, be supported, and kept safe.

Bespoke Learning Ltd.'s procedures for managing allegations of child-on-child abuse are outlined in the Child-on-child Abuse Policy. Teachers will follow these procedures, as well as the procedures outlined in Bespoke Learning Ltd.'s Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

8. Safeguarding in the Curriculum

Bespoke Learning Ltd is dedicated to ensuring that all children are taught how to keep themselves and others safe, including online. Safeguarding education is embedded throughout teaching and is tailored to the individual needs, vulnerabilities, and lived experiences of each learner, including children who are victims of abuse and those with special educational needs and/or disabilities (SEND).

As a sole-trader Alternative Education Provider delivering 1:1 tuition in community spaces, safeguarding education is delivered through a personalised, relationship-based curriculum that includes:

- Working within statutory guidance relating to Relationships and Sex Education (RSE) and Health Education (to be introduced September 2026), and the Early Years Foundation Stage (EYFS) statutory framework where relevant to the learner's age and stage.
- Personal, Social, Health and Economic (PSHE) education, delivered in an age-appropriate and trauma-informed way, covering key safeguarding themes such as:
 - 🚩 Supporting children to develop the skills that underpin positive relationships
 - 🚩 Healthy and respectful relationships
 - 🚩 Boundaries, consent, and kindness
 - 🚩 Stereotyping, prejudice, and equality
 - 🚩 Violence against women and girls
 - 🚩 Body confidence and self-esteem
 - 🚩 Recognising and reporting concerns about abusive or controlling behaviour
- Recognising and reporting concerns about abusive or controlling behaviour
- Understanding the concepts and laws relating to sexual harassment, sexual abuse, grooming, exploitation, coercion, domestic abuse, forced marriage, and Female Genital Mutilation (FGM), and how to access support
- Understanding what constitutes sexual harassment and sexual violence, why these behaviours are always unacceptable, and that responsibility never lies with the victim
- Recognising misinformation, disinformation, and conspiracy theories
- A preventative education approach that prepares children for life in modern Britain and promotes a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence or harassment.

- Appropriate online safety measures, including the use of safe devices, secure platforms, and proportionate filtering and monitoring arrangements. As Bespoke Learning Ltd does not operate fixed premises or a school-wide IT network, online safety focuses on safe device use, safe search practices, and supporting children to navigate online risks confidently and safely.
- A responsive curriculum, shaped by safeguarding themes or patterns identified through ongoing work with the learner, the DSL, parents/carers, and commissioning local authorities (e.g., addressing emerging concerns such as bullying, online harm, or unhealthy relationships).
- Engagement with parents and carers, offering opportunities to discuss safeguarding themes, curriculum content, and approaches to supporting the child's safety and wellbeing.
- Valuing pupil voice, ensuring that children can influence the content and focus of their learning through regular discussions, reflective activities, and personalised planning. In a 1:1 setting, pupil voice is gathered continuously and meaningfully through conversation, observation, and learner led choices.

Online Safety

Bespoke Learning Ltd has a separate, dedicated online safety policy that sets out how the organisation promotes safe and responsible use of technology, manages online risks, and ensures proportionate and effective online safeguarding practice. This safeguarding policy should be read alongside the Online Safety Policy for full details of procedures, expectations, and risk-management arrangements. Bespoke Learning Ltd. will adhere to its Online Safety Policy at all times.

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

- Content: being exposed to illegal, inappropriate or harmful material.
- Contact: being subjected to harmful online interaction with other users.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. (Pg. 33 KCSiE2022) If there is a concern that a student is at risk, a concern should be raised by the teacher. In consultation with PDSCP-Children Exposed to Abuse through the Digital Media, Dawn Griffiths DSL will report to the Anti- Phishing Working Group <https://apwg.org/>. Bespoke Learning recognises that students will use mobile phones and

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

Through training, teachers will be made aware of:

- student attitudes and behaviours which may indicate they are at risk of potential harm online.
- the procedure to follow when they have a concern regarding a student's online activity.

Student's personal electronic devices

Bespoke Learning recognises that students will use mobile phones and computers at some time. They are a source of fun, entertainment, communication, and education. However, some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, behaviours, web cam photography or face-to-face meetings. Chatrooms and social networking sites are the most obvious sources of inappropriate and harmful content and behaviour. Although students will not have the opportunity to access these sites when working 1:1 with a teacher it is essential that teachers are alert to signs of grooming, radicalisation, sharing of personal information and cyber bullying when working with their student.

Bespoke Learning Ltd. will ensure that students are not left alone and are monitored when using public library computers to prevent students accessing inappropriate material. Bespoke Learning Ltd. does not provide computers for its students. ICT work is carried out in public libraries, therefore it is not subject to meeting the [filtering and monitoring standards](#) published by the DfE but teachers are aware of them and mindful of the risk when students are working on computers in the public library.

Teachers will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding Bespoke Learning Ltd.'s approach to online safety can be found in the Online Safety Policy.

Communicating with parents about online safety

Bespoke Learning Ltd. will make it clear to parents what their children are being asked to do online for their studies. They will be directed to its online safety policy at www.bespokelearningltd.com.

As part of the usual communication with parents/carers, teachers will reinforce the importance of students being safe online and inform parents of the dangers that their child faces online. They will inform parents/carers that they will find it helpful to visit [NSPCC](#) - Internet Safety- and to set up parental controls on their child's phone/tablet/laptop/computer to protect their child. Use Parental Controls to Keep Your Child Safe | NSPCC.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by Bespoke Learning Ltd. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

9. Consensual and non-consensual sharing of indecent images and videos

Bespoke Learning Ltd. will ensure that teachers are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as “sexting” or youth-produced sexual images) as a safeguarding concern.

Teachers will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the student, and sexual behaviour that is inappropriate and harmful. Teachers will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in Bespoke Learning Ltd. community, including understanding motivations, assessing risks posed to students depicted in the images, and how and when to report instances of this behaviour.

Teachers will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, teachers will ensure that students are not unnecessarily criminalised.

Where a teacher becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

10. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All teachers, particularly the DSL, will always consider the context of safeguarding incidents. Assessment of students’ behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. Bespoke Learning Ltd. will provide as much contextual information as possible when making referrals to CSCS.

11. Students potentially at greater risk of harm

Bespoke Learning Ltd. recognises that some groups of students can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of students. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Students who need social workers

Students may need social workers due to safeguarding or welfare needs. These needs can leave students vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a student has a social worker to make decisions in the best interests of the student's safety, welfare, and educational outcomes.

Where a student needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the School Attendance (Pupil Registration) (England) Regulations 2024, Bespoke Learning Ltd. will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a student from Bespoke Learning Ltd. for EHE, Bespoke Learning Ltd., in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the student has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously looked after children (PLAC), also known as care leavers, can also remain vulnerable after leaving care.

Dawn Griffiths, DSL, will ensure that teachers have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate teachers have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the student.

The DSL will be provided with the necessary details of students' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in Bespoke Learning Ltd.'s LAC Policy.

Students with SEND

When managing safeguarding in relation to students with SEND, teachers will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a student's indicators relate only to their disability
- Students with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a student with SEND, the DSL will liaise with the LADO and if appropriate, the student's Inclusion Lead and Social worker as well as the student's parents where appropriate, to ensure that the student's needs are met effectively.

LGBTQ+ students

The fact that a student may be LGBTQ+ is not in itself an inherent risk factor for harm; however, teachers will be aware that LGBTQ+ students can be targeted by other individuals. Teachers will also be aware that, in some cases, a student who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as students who identify as LGBTQ+.

Teachers will also be aware that the risks to these students can be compounded when they do not have a trusted adult with whom they can speak openly with. Teachers will endeavour to reduce the additional barriers faced by these students and provide a safe space for them to speak out and share any concerns they have.

Students requiring mental health support

Teachers will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

12. Work experience

Bespoke Learning Ltd. does not host work experience visits as its work is 1:1 with vulnerable students and therefore it would not be appropriate to offer work experience placements for young people.

13. Alternative provision

When enrolled at Bespoke Learning Ltd. the student's school will remain responsible for the student's welfare during their time at an alternative provider, such as Bespoke Learning Ltd. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff and will satisfy itself that the placement is meeting the pupil's needs.

Those responsible for the commissioning of alternative provision will be aware that pupils in alternative provision will often have complex needs – they will be mindful of the additional risk of harm that these pupils may be vulnerable to.

14. Concerns about students

This should be read in conjunction with Bespoke Learning Ltd.'s Low Level Concern Policy. A low-level concern is never insignificant, and all concerns will be taken very seriously.

Appendix 2 [reporting low level concern form \(Dorset\)](#)

Appendix 3 [You have a concern about a child, flow chart \(BCP\)](#)

If a teacher has any concern about a student's welfare, or a student has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL.

Teachers will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Teachers will be aware that this must not prevent them from having professional curiosity and speaking to the DSL if they have a concern about a student.

Teachers are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the [Communication and confidentiality](#) section of this policy.

When a teacher is teaching on behalf of Bespoke Learning Ltd. the DSL is always available.

If early help is appropriate, the case will be kept under constant review. If the student's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in a password protected document on the DSL's laptop. There will be no other copies.

If a student is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a student has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, Bespoke Learning Ltd. will ensure that the student's wishes are always considered, and that there are systems available for students to provide feedback and express their views. When responding to safeguarding concerns, teachers will act calmly and supportively, ensuring that the student feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

If a teacher has a concern about a child which they consider urgent they should contact [The Family Support and Advice Line](#) on 01305 228558 or out of hours on 01305 221000.

In addition, If a teacher has concerns regarding an adult who works with a child, then this should be reported to LADO within one working day using the [referral form](#).

15. Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.

All teachers, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide teachers members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students involved. The DSL will work closely with the police to ensure Bespoke Learning Ltd. does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a student has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

Bespoke Learning Ltd. will not wait for the start or outcome of an investigation before protecting the victim: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, Bespoke Learning Ltd. will consider referring the incident again if it is believed that the student is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and Bespoke Learning Ltd. agrees with this decision, Bespoke Learning Ltd. will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the student or others at potential risk of harm. Bespoke Learning Ltd. will work closely with parents to ensure that the student, as well as their family, understands the arrangements in place, is effectively supported, and knows where they can access additional support.

16. Concerns about Bespoke Learning Ltd.'s safeguarding practices

Any concerns regarding the safeguarding practices at Bespoke Learning Ltd. will be raised by stakeholders such as a student, a teacher or a parent and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a teacher feels unable to raise an issue with the DSL, they should access other whistleblowing channels such as the [NSPCC whistleblowing helpline](#) (0800 028 0285) or they may contact [The Family Support and Advice Line](#) on 01305 228558.

Bespoke Learning Ltd. advises all stakeholders that any concerns relating to a teacher's conduct, organisational practice, or the culture of safeguarding should be raised in accordance

with the organisation's Low Level Concerns Policy (Addendum to the Safeguarding and Child Protection Policy, 2025–2026). This policy outlines the procedures for reporting, recording, and responding to low-level concerns to ensure transparency, accountability, and the highest standards of learner safety.

17. Safeguarding concerns and allegations of abuse against teachers

Bespoke Learning Ltd. advises all stakeholders that any concerns, disclosures, or allegations relating to staff conduct, professional boundaries, or potential harm can be reported in accordance with the organisation's **Allegations Management policy** (2025–2026) which sets out the statutory procedures for reporting, escalating, and responding to allegations. All allegations against teachers will be managed in line with Bespoke Learning Ltd.'s Allegations Management Policy, a copy of which will be provided to, and understood by, all teachers. Bespoke Learning Ltd. will ensure all allegations against teachers, including those who are not employees of Bespoke Learning Ltd., are dealt with appropriately and that Bespoke Learning Ltd. liaises with the relevant parties. Stakeholders can use the Allegations management flow chart for ease of reporting to the LADO of either BCP or Dorset Local Authority.

When managing allegations against teachers, Bespoke Learning Ltd. will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations Management Policy. Allegations that meet the harms threshold include instances where teachers have:

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

18. Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within Bespoke Learning Ltd. and with other schools/AEPs on transfer including in-year and between primary and secondary education, and with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent program.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with Bespoke Learning Ltd.'s data protection policies.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, Bespoke Learning Ltd. will consult its policy and agree on what information will be disclosed to teachers and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, Bespoke Learning Ltd. will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst teachers and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, teachers will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary. The DSL will seek the guidance of the [LADO](#). Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a student is leaving Bespoke Learning Ltd. the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival. This decision will be made with the L.A. Inclusion Lead with support from the LADO if needed.

19. Safer recruitment

As a sole-trader Alternative Education Provider, Bespoke Learning Ltd. pays full regard to the safer recruitment principles outlined in *Keeping Children Safe in Education, Part Three* (DfE 2025). Although I do not employ staff and do not intend to recruit, I maintain robust safer-recruitment standards within my operating procedures to ensure that any future changes to staffing or partnership arrangements remain compliant.

Because I operate as the sole practitioner:

- I do not recruit or appoint staff.
- I maintain an enhanced DBS certificate with barred-list check, renewed and monitored in line with statutory expectations.
- I ensure that my professional qualifications, identity documentation and right-to-work status are up to date, and available for inspection by commissioners on request.
- If my operating model were to change, I would implement full safer-recruitment procedures, including identity verification, qualification checks, employment-history scrutiny, reference checks, health and capacity checks, and all required DBS, barred-list and prohibition checks.
- I do not use recruitment materials, but if recruitment were to occur, all materials would clearly state my commitment to safeguarding and promoting the welfare of children.
- Any contractors or visiting professionals (e.g., maintenance workers in community venues) are required to provide appropriate assurances, including identification checks on arrival and confirmation of DBS status where relevant.

Bespoke Learning Ltd.'s full policy and procedures for safer recruitment are outlined in its Safer Recruitment Policy.

Referral to the DBS

Bespoke Learning Ltd. will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of teachers has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

20. Single central record (SCR)

Bespoke Learning Ltd currently operates as a sole-practitioner provision and does not employ any staff, agency workers, third-party supply teachers or volunteers. As such, a Single Central Record (SCR) is not required at this time. Despite this, Dawn Griffiths has created and maintains an SCR for herself as the sole teacher within the business, ensuring transparent and robust safeguarding practice that exceeds statutory expectations. However, should the organisation recruit staff in the future, Bespoke Learning Ltd will maintain a fully compliant SCR in line with *Keeping Children Safe in Education (DfE 2025)*. The SCR would record all required pre-employment checks for every individual engaged in regulated or relevant activity.

The SCR would include:

- An identity check
- A barred-list check
- An enhanced DBS check
- A prohibition from teaching check
- Verification of professional qualifications, where required
- A right-to-work in the UK check
- Additional checks for individuals who have lived or worked outside the UK
- Any other information deemed relevant to safer recruitment and statutory compliance

If recruitment were to occur, the details of each individual would be recorded on the SCR and removed once they no longer work for Bespoke Learning Ltd.

21. Training

The Designated Safeguarding Lead (DSL), Dawn Griffiths engages in regular child protection and safeguarding training and updates this training at least every two years. In addition, Dawn Griffiths completes a minimum of one safeguarding course per year, ensuring continuous professional development beyond statutory requirements.

The DSL accesses current safeguarding resources and attends relevant refresher or specialist training to remain fully up to date with developments in legislation, guidance, and best practice. This includes the following training completed since March 2023:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conference, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, students with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by students with SEND.
- Suicide prevention
- BEAT Eating disorders
- LGBTQ+ awareness training
- Child Safeguarding Practise Reviews

- Understanding Developments in mixed Influence Extremism
- Attendance at Locality Forums

Should Bespoke Learning Ltd. recruit teachers, they will undergo safeguarding and child protection training at induction, which will be updated whenever there is a change in legislation.

The induction training would cover:

- The Child Protection and Safeguarding Policy.
- The Child-on-child Abuse awareness training.
- The Teachers Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- The Online Safety Policy
- Appropriate child protection and safeguarding training, including online safety training – which, amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL.

Teachers would also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Teachers would receive opportunities to contribute towards and inform the safeguarding arrangements in Bespoke Learning Ltd.

22. Monitoring and review

This policy is reviewed annually by the DSL, Dawn Griffiths. This policy will be updated as needed to ensure it is up to date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to teachers. Teachers are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy is 01.09.26.

Any child protection incidents at Bespoke Learning Ltd. will be followed by a review of the safeguarding procedures within the organisation by the Director and DSL, Dawn Griffiths. Where an incident involves a member of staff or Dawn Griffiths, the LADO will assist in this

review to determine whether any improvements can be made to Bespoke Learning Ltd.'s procedures.

If any concerns are raised by the LADO about safeguarding issues, the following actions will be taken:

- The DSL will carry out an investigation as a priority and comply with any deadlines given by the LADO
- Dawn Griffiths will report to the LADO on the findings of the investigation and set out any action to be taken
- Dawn Griffiths will comply as soon as possible with any recommendations from the LADO
- Dawn Griffiths will comply as soon as possible with any recommendations from the LADO

Appendix 1 Key safeguarding areas

This appendix sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. [Domestic abuse](#)
2. [Homelessness](#)
3. [Children absent from education](#) – including persistent absence
4. [Child abduction and community safety incidents](#)
5. [Child criminal exploitation \(CCE\)](#)
6. [Cyber-crime](#)
7. [Child sexual exploitation \(CSE\)](#)
8. [Modern slavery](#)
9. [FGM](#)
10. [Virginity testing and hymenoplasty](#)
11. [Forced marriage](#)
12. [Radicalisation](#)
13. [Students with family members in prison](#)
14. [Students required to give evidence in court](#)
15. [Mental health](#)
16. [Serious violence](#)

Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, ‘**domestic abuse**’ is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. ‘**Abusive behaviour**’ includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. ‘**Personally connected**’ includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Bespoke Learning Ltd. will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All teachers will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Homelessness

The DSL will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. Bespoke Learning Ltd. will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of students becoming absent from education in the future. Teachers will monitor students that are absent from Bespoke Learning Ltd., particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. Bespoke Learning Ltd. will inform the LA of any student who fails to attend regularly or has been absent without Bespoke Learning Ltd.’s permission for a continuous period of 10 school days or more.

Bespoke Learning Ltd. will follow the DfE’s [guidance](#) on improving attendance where there is a need to work with children’s services due to absence for education indicating safeguarding concerns.

Admissions register

Students are placed on Bespoke Learning Ltd.’s roll at the beginning of the first day that is agreed by Bespoke Learning Ltd., or when Bespoke Learning Ltd. has been notified that the student will first be attending.

Bespoke Learning Ltd. will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each student where possible. Teachers will monitor students who do not attend Bespoke Learning Ltd. on the agreed date and will notify Dawn Griffiths who will notify the LA at the earliest opportunity.

If a parent notifies Bespoke Learning Ltd. that their child will live at a different address, Bespoke Learning Ltd. will record the following information on the admissions register:

- The full name of the parent with whom the student will live
- The new address
- The date from when the student will live at that address
- Dawn Griffiths will inform the student's Inclusion Lead

To ensure accurate data is collected to allow effective safeguarding, Bespoke Learning Ltd. will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of Bespoke Learning Ltd. by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend Bespoke Learning Ltd., and no longer live within a reasonable distance of the premises.
- Have been certified by Bespoke Learning Ltd.'s medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the student continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and Bespoke Learning Ltd. does not reasonably believe they will be returning to Bespoke Learning Ltd. at the end of that period.

Bespoke Learning Ltd. will also remove a student from the admissions register where Bespoke Learning Ltd. and LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.

If a student is to be removed from the admissions register, Bespoke Learning Ltd. will provide the LA with the following information:

- The full name of the student
- The full name and address of any parent with whom the student lives
- At least one telephone number of the parent with whom the student lives
- The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended)

Bespoke Learning Ltd. will work with the LA to establish methods of making returns for students back into Bespoke Learning Ltd. or to source a new provider if appropriate. Bespoke Learning Ltd. will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. Bespoke Learning Ltd. will also highlight any other necessary contextual information, including safeguarding concerns.

Child abduction and community safety incidents

For the purposes of this policy, '**child abduction**' is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

Students will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

Child criminal exploitation (CCE)

For the purposes of this policy, '**child criminal exploitation**' is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

Bespoke Learning Ltd. will recognise that students involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. Bespoke Learning Ltd. will also recognise that students of any gender are at risk of CCE.

Teachers will be aware of the indicators that a student is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

County lines

For the purposes of this policy, '**county lines**' refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, teachers will be aware of the specific indicators that a student may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.

- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Teachers will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs. Teachers who suspect a student may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

Cyber-crime

For the purposes of this policy, **‘cyber-crime’** is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All teachers will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring students to the National Crime Agency’s Cyber Choices programme.

Child sexual exploitation (CSE)

For the purposes of this policy, **‘child sexual exploitation’** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Bespoke Learning Ltd. will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the student’s immediate knowledge, e.g. through others sharing videos or images of them on social media. Bespoke Learning Ltd. will recognise that CSE can affect any student who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes students aged 16 and above who can legally consent to sexual activity. Bespoke Learning Ltd. will also recognise that students may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School teachers will be aware of the key indicators that a student is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, teachers will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. Bespoke Learning Ltd. will cooperate as needed.

Modern slavery

For the purposes of this policy, '**modern slavery**' encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

Teachers will be aware of and alert to the signs that a student may be the victim of modern slavery. Teachers will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

FGM

For the purposes of this policy, '**FGM**' is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Teachers will be alert to the possibility of a student being at risk of FGM, or already having suffered FGM. If teachers are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. Bespoke Learning Ltd.'s procedures relating to managing cases of FGM and protecting students will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a student under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine students, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not

apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

Teachers will be aware of the indicators that students may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the student. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so teachers will be sensitive when broaching the subject.

Indicators that a student may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The student coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

Teachers will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the student:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called '**honour-based' abuse (HBA)**, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Teachers will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Teachers will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. Bespoke Learning Ltd. will educate students about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where students feel safe enough to make a disclosure.

Students aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All teachers will be aware of the following indicators that a student is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A student is known to have requested either procedure or asks for help
- Family members disclose that the student has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the student is in a relationship, or plans for them to be married

- A close relative has been threatened with either procedure or has already been subjected to one
- A student has already experienced or is at risk of other forms of HBA
- A student is already known to social services in relation to other safeguarding issues
- A student discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A student displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A student appears fearful of their family or a particular family member
- Unexplained absence from education, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, teachers members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

Bespoke Learning Ltd. will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the student, including expediting arrangements for the procedure.

Forced marriage

Forced marriage is illegal in the UK and is always a safeguarding concern. The DSL will take immediate protective action.

1. Treat the disclosure as a safeguarding emergency

- Recognise forced marriage as abuse and a crime
- Prioritise the young person's immediate safety
- Will not approach or inform the family — this can significantly increase risk.

2. Make an urgent referral to Children's Social Care

- Contact the local Children's Services immediately
- Provide full details of the concern, including any imminent travel plans
- Follow up in writing within 24 hours

3. Contact the Police if there is immediate danger

- Call 999 if the young person is at risk of being taken abroad or harmed
- Request police protection measures if needed

4. Contact the Forced Marriage Unit (FMU) for specialist advice

- Seek guidance on safety planning and legal options
- Discuss whether a Forced Marriage Protection Order (FMPO) is appropriate

5. Record everything accurately and securely

- Document the disclosure in the young person's own words
- Record actions taken, times, and who was contacted
- Store records in line with safeguarding and data-protection requirements

6. Provide ongoing support to the young person

- Reassure them they are not to blame
- Ensure they know they are protected by law
- Support them to access specialist services

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

Teachers will be alert to the indicators that a student is at risk of, or has undergone, forced marriage, including, but not limited to, the student:

- Being absent from education – particularly where this is persistent.
- Requesting extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming holidays.
- Being subjected to surveillance by siblings or cousins.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from education by their parents.
- Being removed from a day centre when they have a physical or learning disability.

- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Bespoke Learning Ltd. will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

Bespoke Learning Ltd. will aim to create an open environment where students feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum.

Radicalisation

For the purposes of this policy, **‘radicalisation’** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, **‘extremism’** refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, **‘terrorism’** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting students from the risk of radicalisation is part of Bespoke Learning Ltd.’s wider safeguarding duties. Bespoke Learning Ltd. will actively assess the risk of students being radicalised and drawn into extremism and/or terrorism. Teachers will be alert to changes in students’ behaviour which could indicate that they may need help or protection. Teachers will use their professional judgement to identify students who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. Bespoke Learning Ltd. will work with local safeguarding arrangements as appropriate.

Bespoke Learning Ltd. will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, Bespoke Learning Ltd. will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the student's parents, unless Bespoke Learning Ltd. has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other teachers on how to protect students against the risk of radicalisation. The DSL will hold formal training sessions with teachers to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

The Prevent duty

Under section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have 'due regard to the need to prevent people from being drawn into terrorism', known as '**the Prevent duty**'. The Prevent duty will form part of Bespoke Learning Ltd.'s wider safeguarding obligations.

Students with family members in prison

Students with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Students required to give evidence in court

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Students will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Mental health

All teachers will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Teachers will not attempt to make a diagnosis of mental health problems – Bespoke Learning Ltd. will ensure this is done by a trained mental health professional. Teachers will, however, be encouraged to identify students whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Teachers will also be aware of how students' experiences can impact on their mental health, behaviour, and education.

Teachers who have a mental health concern about a student that is also a safeguarding concern will act in line with this policy and speak to the DSL.

Dawn Griffith, DSL, will access a range of advice to help them identify students in need of additional mental health support, including working with external agencies.

Serious violence

Through training, teachers will be made aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from education.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Teachers will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from education.
- Having been permanently excluded from education.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Teachers who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Appendix 2

Low-Level Concern Form



Low Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with Bespoke Learning Ltd.’s staff code of conduct, including inappropriate conduct outside of work, **and**
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated and returned to Dawm Griffiths, DSL, by email marked ‘High Priority’ and followed up immediately by a phone call 07952 647175

Name of staff member:

Details of Concern:

Appendix 3

