# SAFEGUARDING AND CHILD PROTECTION POLICY

# Prior Park College

| **Policy Owner**<br><br>DSL/Deputy Head Pastoral | **Applies to**<br><br>Prior Park College | **Superseded documents**<br><br>Safeguarding and Child Protection Policy v3 |
|---|---|---|
| **Associated documents**<br><br>All PPC specific and PPS Associated Safeguarding Policies | **Review frequency**<br><br>Every year (unless the legislation/regulations update before this time)<br><br>**Implementation date**<br><br>18 September 2025 | **Legal Framework**<br><br>KCSIE 2025<br>NMS Boarding 2022<br>Working Together to safeguard children 2023<br>Prevent Duty: Guidance for England and Wales 2023<br>See section 2.6 for all statutory frameworks |

**PRIOR PARK SCHOOLS SAFEGUARDING STATEMENT**

**Safeguarding and child protection are at the forefront of all that we do and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.**

We believe that:

- children and young people should never experience abuse of ***any*** kind
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

We recognise that:

- the welfare of children is paramount in all the work we do and in all the decisions we take
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

We will seek to keep all children and young people safe by:

- valuing, listening to and respecting them
- appointing, at each school, a Designated Safeguarding Lead (DSL) for children and young people, at least one deputy DSL
- appointing a lead Trustee for safeguarding
- adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions
- making sure that children, young people and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

**This policy is reviewed annually, or more regularly as required, prior to approval by Trustees, where applicable.**

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| **Last reviewed by:** | Deputy Head Pastoral and DSL (Mrs Isobel Burton), Headmaster (Mr B Horan) and Head of Compliance (Miss Emma Wickham) |
| **Date last reviewed:** | August 2025 |
| **Approved by Nominated Safeguarding Trustee and Deputy Safeguarding Trustee:** | Approved by Mr N Dowler, Mr P Lyon and Mr D Catlow and ratified by the BOT at FAIR |
| **Approved by Trustees:** | As detailed below |
| **Date for next approval:** | September 2026 |

**This Policy has been approved by the Nominated Safeguarding Trustees and the Chair of Trustees; it will be ratified by the BOT at FAIR on the 18th September 2025.*

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and The Paragon School (TP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park School Gibraltar (PPSG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

The Prior Park Schools mission, underpinned by shared values, is to steward a thriving family of communities with love for the young people they serve at their heart. These vibrant communities cultivate creativity, foster integrity, and transform lives.

Prior Park Schools Values:

Curiosity – Generosity – Courage

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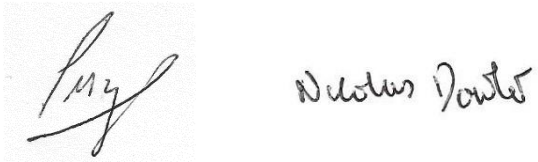
| **Policy Approved by: Safeguarding Trustees Mr Nic Dowler and Mr Paul Lyon**  | **Date: 5 September 2025** |
| **Designated Safeguarding Lead: Mrs Isobel Burton** | **Date: 1 September 2025** |
| **Chair of Trustees: Mr David Catlow** | **Date: 10 September 2025** |

1: Safeguarding contact details

2: Introduction

3: Principles

4: Roles and Responsibilities

5: Key personnel

6: Boarding

7: Staff training

8: Interventions

9: Early Help

10: What to look out for and when to be concerned

11: Contextual safeguarding

12: Signs of abuse

13: Listening to children and record taking

14: Procedures to be followed by staff if they have concerns about a child's welfare

15: Duties of the DSL on being notified of a concern about a child's welfare

16: Making referral to children's social services

17: Informing parents

18: Allegations about members of staff, supply staff, contractors and volunteers

19: Low-Level concerns

20: Arrangements for dealing with child-on-child abuse and allegations

21: Child on child sexual violence and sexual harassment

22: Other safeguarding arrangements

Appendix 1: Other types of abuse
Appendix 2: Further information on signs of abuse
Appendix 3: Actions where there are concerns about a child (KCSIE, Sept 2025)
Appendix 4: Flowchart of when and how to share information
Appendix 5: DSL job description
Appendix 6: Missing child flow charts
Appendix 7: Flowchart of checks needed on new staff, volunteers, contractors, supply staff and students.

## 1. Safeguarding Contact Details

***Prior Park College***

| Position | Name | Contact details |
|---|---|---|
| Headmaster | Mr Ben Horan | bhoran@priorparkschools.com |
| Designated Safeguarding Lead (DSL) & LAC Lead | Mrs Isobel Burton | iburton@priorparkschools.com |
| Deputy Designated Safeguarding Lead (DDSL) & E-Safety Lead | Mr Dave Sackett | dsackett@priorparkschools.com |
| Deputy Designated Safeguarding Lead (DDSL) | Ms Laura Sutherland | lsutherland@priorparkschools.com |
| Deputy Designated Safeguarding Lead (DDSL) | Mrs Jill Bendry | jbendry@priorparkschools.com |
| Deputy Designated Safeguarding Lead (DDSL) | Miss Emma Wickham | ewickham@priorparkschools.com |
| Deputy Designated Safeguarding Lead (DDSL) & Boarding Lead(s) | Mrs Sukey Holder &<br>Mr David Holmes | sholder@priorparkschools.com<br>dholmes@priorparkschools.com |
| Nominated Safeguarding Trustee | Mr Paul Lyon<br>Mr Nic Dowler | plyon@priorparkschools.com<br>ndowler@priorparkschools.com |
| Chair of Trustees | Mr David Catlow | dcatlow@priorparkschools.com |

***B&NES Council- Who to contact with a concern about a child?***

| Role | Name | Contact Details |
|---|---|---|
| Head of Service Children's Quality Assurance and Safeguarding | Sarah Hogan | 01225 395218 |
| Team Manager Triage Team | Ellis Woodley | 01225 395076 ChildCare_Duty@bathnes.gov.uk<br>CDC: 01225 396111 |
| Virtual School Headteacher | Sarah Gunner | 01225 477395 |
| B&NES Prevent Lead | Samantha Jones | 01225 396364 samantha_jones@bathnes.gov.uk |

***Who to contact with a concern about an adult?***

| | | |
|---|---|---|
| Deputy Safeguarding Lead and Local Authority Designated Officer (LADO) | Victoria Harlin | 01225 396890<br>LADO@bathnes.gov.uk |

***Other BANES useful contacts***

| | | |
|---|---|---|
| Director of Education & Safeguarding | Chris Wilford | 01225 477109 |
| Director of Children's Services & Education | Jean Kelly | 01225394930 |
| Assistant Director Children & Young People | Phoebe Holland | 01225396907 |
| Head of Service - Care Outcomes | Jo Parker | 01225396957 |
| Head of Service – Safeguarding Outcomes | Sam MacDonald | 01225396860 |

***Other useful contact details***

| Organisation | Phone |
|---|---|
| Childline | 0800 1111 |
| NSPCC | 0808 800 5000 |
| Kidscape (Anti-bullying helpline for parents) | 0845 120 5204 |
| Report Abuse in Education | 0800 136 663 |
| National Domestic Abuse Helpline | 0800 2000 247 |
| Child Exploitation Online Prevention (CEOP) | 0370 496 7622<br>www.ceop.police.uk/safety-center/ |

## 2. Introduction

2.1 Prior Park College is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. Prior Park College recognises that children and young people learn best when they are healthy, safe and secure. Prior Park College actively promotes a culture of safeguarding and encourages all staff to prioritise the safeguarding of our students.

2.2 If children and families are to receive the right help at the right time, **everyone who comes into contact with them has a role to play in identifying concerns**, sharing information and taking prompt action. Providing help and support to meet the needs of children as soon as problems emerge. It is defined as: Protecting children from maltreatment, whether that is within or outside the home, including online, Preventing the impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, taking action to enable all children to have the best outcomes.

2.3 This policy applies to all children at Prior Park College, including those in Boarding.

2.4 The purpose of this policy is to inform all staff (including supply staff), parents (including guardians and carers), contractors, volunteers and Trustees about Prior Park College's responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with children – even where this is away from the school, such as on educational visits or whilst delivering lessons online. It also includes children who are placed in alternative provision but remain on our school roll.

2.5 This policy is published on Prior Park College's website, part of Prior Park Schools, and is also available to parents of current and prospective children from the Designated Safeguarding Lead on request.

2.6 The policy is drafted in accordance with Bath & North East Somerset Community Safety and Safeguarding Partnership (BCSSP) agreed local interagency procedures. In June 2019 the B&NES Community Safety and Safeguarding Partnership was approved by Avon Fire and Rescue, Avon and Somerset Constabulary, B&NES Clinical Commissioning Group, B&NES Council and the National Probation Service. It was developed in partnership with the existing members of the Local Safeguarding Children Board, Local Safeguarding Adult Board and RAG which it replaces. The partnership commenced operation in September 2019.

All action is taken in line with relevant legislation and guidance including:

- Keeping Children Safe in Education (DFE Sept 2025)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (2020)
- Disqualification under the Childcare Act 2006 (August 2018)
- What to do if you are worried a child is being abused (March 2015)
- Working Together to Safeguard Children (2023)
- Revised Prevent Duty Guidance for England & Wales (Dec 2023)
- The Prevent Duty: departmental advice for schools (June 2015)
- The use of social media for online radicalisation (July 2015)
- Relationship's education, relationships and sex education (RSE) and health education (July 2019)
- NSPCC; When to call the Police
- The Children Act 1989, The Children Act 2004
- Education Act 2002, Section 175 and Section 157
- National Minimum Standards for Boarding, 5 Sept 2022
- Independent School Standards Regulations November 2014
- South West Child Protection Procedures (SWCPP) at www.swcpp.org.uk
- Bath & North East Somerset Community Safety and Safeguarding Partnership

2.7 This Safeguarding Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the whole school staff, trustees and volunteers. All staff should be aware of systems within Prior Park College which support safeguarding, and these should be explained as part of staff induction.

This includes (but not limited to):

- Safeguarding Policy
- Behaviour Policy
- Staff Code of Conduct
- Low-Level Concerns
- Child-on-Child Abuse Policy
- Safeguarding response to children who are absent from education for prolonged periods and/or repeated occasions.
- Role of the Designated Safeguarding Lead (DSL), which is also included in this policy
- Applicable part of KCSIE (at the discretion of the Trustees)
    - Trustees and Senior Leadership Teams (including HR) read **ALL OF KCSIE**
    - Staff working directly with children read **PART ONE OF KCSIE and ANNEX B OF KCSIE (As replicated in Appendix 1 of this Policy)**
    - Volunteers working directly with children read **PART ONE OF KSCIE**
    - Staff who do not work directly with children read **ANNEX A OF KCSIE**
    - Volunteers who do not work directly with children read **ANNEX A OF KCSIE**
- Annual face to face safeguarding training by the DSL
- Annual on-line National College course(s)

2.8 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

## 3. Principles

3.1 Prior Park College expects all staff, Trustees and volunteers to share our commitment to safeguarding and promoting the welfare of all children in our care. To achieve this, the School seeks to create a safe School environment with a strong pastoral system, where children who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to children's' concerns, identify issues early and respond appropriately following agreed procedures. Prior Park College will consider, at all times, what is in the best interest of the child.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. This may include seeing, hearing or witnessing the effects of harm to others.
All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

3.2 The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, Trustees and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the Safer Recruitment Policy
- ensure that, where staff from other organisations are working with our children, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children
- follow the local inter-agency procedures of the BCSSP Safeguarding Children's Partnership and contribute to inter-agency working
- support children in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Early Help Assessment (also known as an EHA) and as part of the Team around the Child (TAC) approach
- be alert to signs of abuse, both in the School and from outside and to protect each child from any form of abuse, whether from an adult or another child
- deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with their agreed child protection plan
- design and operate procedures which promote this policy, but which, so far as possible, ensure that teaching staff and other staff who are innocent are not prejudiced by false allegations
- be alert to the needs of children with physical and mental health condition
- be alert and respond to children with unexplainable or persistent absences
- operate robust and sensible health and safety procedures
- operate clear and supportive policies on drugs, alcohol and substance misuse
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area.
- be alert to the risk of the promotion of ideologies online that seek to promote hatred, intolerance or violence through the use of filtering and monitoring systems.
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified
- take all practicable steps to ensure that the School premises are as secure as circumstances permit
- teach children about safeguarding issues and about how to keep themselves safe (including online and when working from home online); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

## 4. Roles and responsibilities

4.1 Safeguarding and child protection is everyone's responsibility. All staff, Trustees, supply staff, contractors and volunteers are under a general legal duty to:

- contribute to providing a safe environment in which children can learn
- consider at all times the best interests of the child and take action to enable all children to have the best outcomes
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL
- to compete additional training on National College or Bluesky as directed by the DSL
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism
- be familiar with the School's policies pertaining to safeguarding and child protection procedures and follow them
- know how to access and implement the procedures, independently if necessary

- keep a sufficient record of any significant complaint, conversation or event
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral
- All staff should understand their roles and responsibilities in relation to filtering and monitoring systems as part of safeguarding training.

4.2 **The Designated Safeguarding Lead (DSL)**

The School has appointed a Designated Safeguarding Lead (DSL) who is a senior member of staff and member of the School's Leadership Team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and in most cases, is the first point of contact for parents, children, staff and others if they have ***any*** concerns about safeguarding or child protection.

The DSL has a responsibility to liaise with the Trustee responsible for safeguarding and jointly complete an annual safeguarding audit, prepare appropriate board reports on a termly basis and an annual report to the full Board.

The School also has four Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the School at all times. The DSL will be given the time, funding, training, resources and support to ensure they are able to fulfil all the key aspects of their role as described in KCSIE (Sept 2025) to include:

- liaise with and manage referrals to relevant agencies such as B&NES Children's Services, the Channel Panel, the Police and the Disclosure and Barring Service (DBS)
- keep the Headmaster and the Local College Board informed of on-going safeguarding and child protection issues and enquiries
- provide advice and guidance for staff on safeguarding and child protection issues and complete Request for Service forms
- ensure the school's safeguarding and child protection policies are up to date and consistent with the latest version of KCSIE and B&NES Safeguarding Children Board policies and that policies are reviewed annually
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them
- attend regular training (in line with BCSSP requirements), including Prevent awareness and Exploitation training, Child Protection Forums meetings hosted by B&NES in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices
- provide regular updates received from B&NES Council and BCSSP to all staff members and Trustees on any changes in safeguarding or child protection legislation (updated information will be provided by B&NES at the Child Protection Forum meeting and safeguarding trainers via BCSSP bulletins; designated safeguarding leads will be responsible for communicating this information to staff immediately; they may decide to hold workshops or discuss in staff meetings)
- have an awareness of those children who may be in need, young carers and children who have special educational needs / disabilities and liaise with the SENDCo when considering any safeguarding action for a child with special needs
- liaise with the designated teacher for LAC/Post LAC whenever there are safeguarding concerns relating to a looked after child or previously looked after child
- oversee child protection systems within the school, including the management of records, standards of recording concerns and referral processes
- provide a link between the school and other agencies, particularly B&NES Children's Services and the BCSSP
- liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. The National Police Chiefs Council (NPCC)- When to call the police

should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do
- ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every year and receive regular updates (e.g. via email, e-bulletins and staff meetings) as required, but at least annually
- ensure parents are fully aware of the school policies and procedures and that they are kept informed and involved
- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support to the child on transfer.
- takes responsibility for understanding the filtering and monitoring systems and processes in place as part of their role

Note: A full description of the responsibilities of the DSL is set out in Appendix 5 of this policy.

The contact details for the DSL, Mrs Isobel Burton are set out in part 1 of this policy.

4.3 **Deputy Designated Safeguarding Leads (DDSL)**

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of children. In the event of a long-term absence of the DSL, a Deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activity may be delegated to a DDSL but final lead responsibility for safeguarding and child protection remains with the DSL.

The contact details of the Deputy DSLs are set out in part 1 of this policy.

4.4 **Headmaster**

The Headmaster is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Headmaster will ensure that:
- the safeguarding and child protection policy and procedures adopted by the Board of Trustees are implemented and followed by all staff
- sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, including the assessment of children and attendance at strategy discussions and other necessary meetings
- matters which affect child welfare are adequately risk-assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated
- systems which operate with the best interests of the child at heart are in place for children to express their views and give feedback
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy and low-level concerns procedures
- children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- safer recruitment procedures are being adhered to in line with Part 3 of KCSIE, September 2025
- acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers) and liaises with the Local Authority Designated Officer (LADO); and
- notifies the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child.

4.5 **Board of Trustees**

The Board of Trustees has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of children. It is the role of the Board of Trustees to provide scrutiny of the safeguarding policy and safeguarding practice. The Board of Trustees takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The Trustees will ensure that all policies and procedures operate with the best interests of the child at their heart.

Trustees will ensure that:

- an effective, up-to-date Safeguarding (child protection) Policy is in place and made available on the School's website
- other policies, as prescribed in Part 2 of KCSIE, are in place and operational
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register
- an appropriate member of staff from the School's Leadership Team is appointed to the role of DSL
- all staff receive safeguarding induction and ongoing training in accordance with this policy
- children are taught about safeguarding, including online safety
- the School's safeguarding arrangements take into account the procedures and practice of the BCSSP
- serious incidents which fall within the threshold of serious incident reporting are reported to the Charity Commission
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified
- clear systems and processes are in place for identifying and managing children with mental health problems
- child protection files are maintained and, where appropriate, such records are transferred to a child's new school or college in accordance with statutory guidance; 5 days for an in-year transfer, or within the first 5 days of the start of a new term to allow the new school/college to have support in place when the child arrives
- appropriate filters and monitoring systems are in place to keep children safe online
- the School reports to their local authority any child who joins or leaves the School at non-standard transition times in line with statutory and local authority guidance; and
- written assurances are provided by individuals or organisations who hire School premises confirming appropriate safeguarding and child protection procedures are in place.
- ensure that all Trustees receive appropriate safeguarding and child protection training at induction. Ensuring that this training will equip them with the knowledge to be able to assure themselves that the safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding.
- Trustees should ensure that their safeguarding training is updated regularly.
- ensure that this policy is reviewed at least annually.
- Trustees should review the DfE's filtering and monitoring standards.
- The trustees should discuss with IT staff and the service providers what needs to be done to support the school in meeting the standards with regards to filtering and monitoring.

4.6 **Nominated Safeguarding Trustee**

Paul Lyon and Nic Dowler are the nominated Safeguarding Trustees who take lead responsibility for monitoring safeguarding arrangements at Prior Park College and across the Trust.

Monitoring of safeguarding is done in a number of ways, these being:

- discussions about safeguarding matters with the DSL at least once a term and more regularly, if needed
- Discuss the safeguarding report once a half term with the DSL
- liaising with the local authority and/or partner agencies where appropriate
- conducting an annual audit of the School's safeguarding procedures and submitting a written report to the Board of Trustees with recommendations for further improvements. The annual written report will typically consider:
  - the effectiveness and implementation of relevant policies
  - staff safeguarding training
  - staff recruitment procedures
  - the handling of safeguarding issues
  - referral management
  - the contribution the school is making to inter-agency working
  - and the provision for teaching children how to keep themselves safe.

This audit will form part of the annual review undertaken by the Board of Trustees as a whole to ensure that all policies, procedures and training provided by the School are effective and comply with the law.

The contact details for the Nominated Safeguarding Trustee are set out in Section 1 of this policy

### 4.7 **B&NES Children's Services**

The Directorate includes Specialist and Targeted Children's Services; Safeguarding and Quality Assurance services and Education services; they are responsible for:

- co-ordinating the delivery of integrated children's services within B&NES, including an early help service
- providing statutory social work services under the Children Act 1989 and the Children and Social Work Act 2017; Working Together 2023; Keeping Children Safe in Education 2025 and all associated guidance and other relevant legal frameworks
- providing the maintained schools with advice, support and guidance, model policies and procedures, training in relation to all aspects of safeguarding children
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated
- sharing with the designated safeguarding lead if a child has a social worker. This information should be used to inform decisions in the best interests of the child's safety.

### 4.8 **Working with Parents and Carers**

Prior Park College recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of students. The school will:

- make parents aware of the school's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on, even if they do not give consent, where necessary, by making all school policies available on the school website or on request
- provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff
- consult with and involve parents and carers in the development of some school policies to ensure their views are taken into account
- ensure a robust complaints system is in place to deal with issues raised by parents and carers
- provide advice and signpost parents and carers to other services and resources where students need extra support.

4.9 **Multi-Agency Working**

Prior Park College will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004, Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2025.

The school recognises its vital role in safeguarding school-age children and will co-operate with the B&NES Community Safety & Safeguarding Partnership (BCSSP) to ensure joint working with partner agencies in order to improve outcomes for children in B&NES. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow the BCSSP arrangements.

Working Together to Safeguard Children is very clear that all schools in the local area should be fully engaged, involved, and included in safeguarding arrangements.

Prior Park College will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

The school will allow access to children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

**4.10 Human Rights**

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute
- right)
- Article 8: the right to respect for private and family life (a qualified right) includes a
- duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be
- protected and applied without discrimination,
- 25 and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.
Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

**4.11 Equality**

The Equality Act 2010 requires that schools and colleges must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).The school/college will be conscious that students with protected characteristics may be more at risk of harm due to disproportionate vulnerabilities and will carefully consider how these students are being supported.
The school/college will, when proportionate, take positive action to deal with the disadvantages affecting students with a particular protected characteristic in order to meet their specific needs.

Guidance can be found at:
Equality Act 2010: advice for schools - GOV.UK (www.gov.uk)
Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

## 5. Key personnel

The DSL at the School is Mrs Isobel Burton Deputy Head (Pastoral) and member of the Senior Leadership Team. If the DSL is unavailable, the role will be carried out by one of the Deputy DSLs:

Mr Dave Sackett
Ms Laura Sutherland
Mrs Jill Bendry
Miss Emma Wickham
Mrs Sukey Holder
Mr David Holmes

The DSL or Deputy DSLs are always available when the School is open to discuss safeguarding concerns with staff, either in person or via telephone, email or MS Teams.

5.1 If the DSL and Deputy DSLs are unavailable, the role will be carried out by the Headmaster. Outside School hours and during out-of-term activities, a designated member of the DDSL Team will assume temporary responsibility.

5.2 The DDSL Mrs Jill Bendry is the designated member of staff who oversees the welfare of looked-after children. The DDSL, Mr Dave Sacket is the designated member of staff who oversee E-Safety.

5.3 Contact details for all the above are contained in section 1 of this policy.

## 6. Boarding for PPC

PPC recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. Boarding staff quickly establish strong relationships with students and are adept at noticing changes in behaviour. We provide students with a wide range of staff and professionals to speak with ('Where to go for help') and our student-led peer support group is always available to students.

**Safeguarding Training**:
All Boarding Staff (House Parents, Resident Tutors and Visiting Tutors) complete the same face to face safeguarding and child protection training and National College courses as all non-boarding staff, as stated within this policy. All Boarding Staff must also read Part One of KCSIE 2025 and Annex B.

The same policies and procedures are used in the Boarding Houses as they are across the school.

**Sexual Relationships:**
All staff are reminded in safeguarding training that it is an offence under section 16 of The Sexual Offences Act 2003, for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if they do not teach the child.

The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

Boarders are provided with specific support and education around sexual relationships. All boarders are given education through the PSHCE programme and more informally within boarding houses. PPC emphasises the importance of healthy relationships and friendships. Within boarding houses there are measures in place to support students; communal areas and clear visiting times, student visitors must sign in and out, are not allowed upstairs, and we always ensure appropriate staff supervision. Boarders are given a range of staff to speak to if they have a concern. The bedrock of this is the strong relationships between boarders and boarding staff. Boarders also have full access to PPC's pastoral support and an independent listener.

**On-Line Safety in Boarding:**
The same filtering and monitoring systems are in place across the boarding houses for school owned PLDs. If a student who boards brings in their own electrical devices, they are educated about being safe online in the same manner as those who do not board.

**Other adults, aged 16 and over, living in Boarding Accommodation (non-employees):**

- Every non-employed and/or not on roll member of a household aged over 16 occupying accommodation is required to have an Enhanced DBS Check and Barred List check. [This clearance is required before the accommodation is occupied. PPC will assist employees and their families in obtaining this clearance].
- All non-employed persons (aged 16 and over if not on roll) of boarding households must sign a declaration, which includes a safeguarding declaration, to comply fully with PPC's policies which relates to the protection of students. PPC can insist that any individual who is not a member of staff removes him/herself from the accommodation where he or she has committed a breach of the agreement which forms part of this Safeguarding Policy.
- PPC arranges the Designated Safeguarding Lead to complete an induction session in child protection for those over 16 and adult members of the households boarding house and accommodated staff within the first week of arrival. PPS keeps a record of everyone who has attended its induction sessions in Safeguarding.
- All non-employed and/or not on roll members of the households of Boarding house staff should be conscious of the fact that they are not a PPC employees and that they have no status regarding the students for whom their spouse/partner/parent is responsible.
- It is important that the guidelines are followed at all times by all household members of boarding staff, as they are designed to protect the children who are in PPC's care.
- Non-employed and/or not on roll household members should not enter or attempt to use any of the areas that are designated for boarders.
- Non-employed and/or not on roll household members should not attempt to establish friendships or relationships with individual students.
- Physical contact with students in boarding houses is not allowed by non-employed and/or not on roll members of the household.
- All Boarding staff are reminded that they must to notify the Headmaster at once if they, their child (if applicable), or any member of the household is ever subject to criminal investigation or any investigation where it is alleged that they have harmed or abused a child or children, including physical, emotional or sexual harm or abuse, exploitation and/or neglect; or ii) behaved in a way that could constitute a criminal offence towards or related to a child or children; or behaved towards a child or children in a way that indicates that they may pose a risk of harm to a child or children.
- PPC will require the Boarding staff, their child or any member of the household to leave school accommodation at once if it became aware of evidence that was considered unsuitable to have contact with children and/or vulnerable adults or if an allegation is raised which suggests they may be unsuitable to have contact with children and/or vulnerable adults.

**Visitors and Overnight Guests to Boarding:**
All visitors and overnight guests staying with Boarding staff are advised, by the Boarding staff that:

- They must not attempt to enter the areas that are designated for the boarders.
- They must be aware of their responsibilities when engaging students in conversation.

- They must go straight to their host's house on entering the campus and go straight to the campus exit on leaving.
- They must be escorted if they visit anywhere in the school apart from their host's accommodation.
- They must be given the name and contact details of the DSL in case of need to report a safeguarding matter.

**Contractors/ Visitors to the Site:**

- All contractors are identified by photo ID cards, which are worn at all times during School-related activities and duties, and the applicable coloured lanyard depending on their clearances.
- Any contractors are signed in at reception and the process for this is as defined in the *Visitors and Contractors Access and Supervision Policy*.
- Contractors be supervised at all times by a member of the Estates Team when they're on site.
- House Parents will be informed of any contractors who will be working in the boarding houses.
- Any organisation that uses the premises for activities with children must be monitored and checks must be carried out in line with Safer Recruitment Policy.
- Staff should low level concerns or contact the DSL directly for any concerns related to adults on the premises.
- This applies to any organisation including school PTA, Complete Sports, Tennis coaching etc
- All concerns relating to visitors to the premises will be dealt with in accordance with the school safeguarding policy.

## 7. Staff training

7.1 Training encourages all members of staff, Trustees and other volunteers to maintain an attitude of **'it could happen here'** and to **'think the unthinkable'** where abuse and neglect are concerned. Staff, Trustees and Volunteers are trained to consider, at all times, what is in the best interest of the child.

7.2 Induction training for all new members of staff, Trustees and other volunteers, includes formal child-protection training which covers:

- This Safeguarding Policy and related policies including:
  - Anti-Bullying, E-Safety, Child-on-Child Abuse, Low-Level Concerns, and Prevent*
- The appropriate parts of KCSIE as detailed below (at the discretion of the Trustees)
  - Trustees and Senior Leadership Teams (including HR) read **ALL OF KCSIE**
  - Staff working directly with children read **PART ONE OF KCSIE and ANNEX B OF KCSIE (As replicated in Appendix 1 of this Policy)**
  - Volunteers working directly with children read **PART ONE OF KSCIE**
  - Staff who do not work directly with children read **ANNEX A OF KCSIE**
  - Volunteers who do not work directly with children read **ANNEX A KCSIE**
- The role, identity and contact details of the DSL and Deputy DSLs
- The identity of the Safeguarding Trustee
- They must be aware and have the view that **"…it could happen here"**
- Policies on acceptable use of IT and online safety (including when they are online at home) *
- An understanding of the expectations, roles and responsibilities in relation to filtering and monitoring as part of E-Safety
- The Behaviour Policy*
- The School's safeguarding response to children who are absent from education for prolonged periods and/or repeated occasions
- The Staff Code of Conduct*
- The School's policy on Raising a Concern at Work 'Whistleblowing'*;
- An overview of the Local Safeguarding Children Partnership's procedures and how to make a referral

**Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them.*

A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff.

7.3 All staff, including Trustees and volunteers involved in regulated activity, will undertake appropriate child-protection training which is in line with BCSSP guidance, and it is updated annually. In addition, all staff will receive safeguarding updates delivered through a combination of CPD, staff meeting updates, and the completion of relevant National College courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training, where appropriate.

7.4 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, the applicable section of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading in the staff section of the staff portal.

7.5 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, child on child abuse, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation.

7.6 The DSL and Deputy DSLs undertake training that is in accordance with BCSSP procedures to provide them with the knowledge and skills necessary to carry out their role.

The role requires a multi-agency perspective and DSLs and DDSLs should complete BCSSP multi-agency child protection training (as recommended by BCSSP), which should be updated at least every 2 years and Prevent Awareness training.

Once the Advanced Inter-agency child protection course has been completed then DSLs and DDSLs can keep their training up to date by attending an appropriate advanced or specialist level course run by the BCSSP at least every two years, including attending the termly updates provided by the BCSSP.

Additional specialist training will be obtained for those who have specific responsibility for looked-after children.

They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

- keep abreast of best practice for promoting a culture of listening to children
- remain up to date on the mechanics of inter-agency working as operated by the BCSSP
- understand the assessment process for providing early help and intervention, for example through locally agreed common assessment processes such as early-help assessments
- have an up-to-date working knowledge of how local authorities conduct child-protection case conferences so they can contribute to these effectively when required to do so
- be alert to the specific needs of children in need, those with Special Educational Needs and young carers
- understand and support the School regarding the requirements of the Prevent duty and provide advice and support to staff on protecting susceptible children from the risk of radicalisation
- be able to keep proper written records of concerns and referrals.

7.7 All members of the Board of Trustees receive safeguarding training annually, to ensure they have the knowledge necessary to exercise appropriate oversight over the School's Safeguarding policies and procedures.

## 8. Intervention

Prior Park College will carry out its duty to safeguard students which is:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully
- educating children to enable them to live safely now and in the future.

8.1 Prior Park College will refer to B&NES thresholds and eligibility criteria (available at the link below) to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.
threshold_for_assessment_.pdf (bathnes.gov.uk)

8.2 All referrals for a children's social care service will be made here:
Report a concern about a child | Bath and North East Somerset Council (bathnes.gov.uk)

8.3 Parental consent must be sought prior to the request for service being made, unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.

8.4 Staff will also share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet the child's needs.

## 9. Early Help

9.1 Prior Park College recognises the importance of providing early help to children to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, mental health and relationship issues.

9.2 If staff believe that a child could benefit from early help, they should discuss the matter with the DSL who will, taking into account the BCSSPs threshold criteria, consider what action should be taken.

9.3 Prior Park College has various mechanisms to help identify emerging problems, including the School's pastoral system, the PSHCE programme and various policies, including Anti Bullying, E-Safety, Mental Health and Prevent. Staff training also prepares staff to identify children who might benefit from early help.

9.4 Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation

- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the school day

9.5 Where the child's additional needs require services, consideration will be given to what early help support can be offered to a child by the school.

9.6 If the child requires an early help service from another agency, the school will make a referral to the Early Help service for appropriate help and support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.

9.7 Where the child is receiving an Early Help service, the school will work as part of the Team around the Child and take up the role of lead professional where this is appropriate.

9.8 Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the school believes that this is not the case, consideration should be given to making a referral for a statutory social work service.

9.9 Reference should also be made to the Neglect Toolkit, Neglect Toolkit Checklist and Key Areas of Neglect.

**Referral for Statutory Social Work Service**

9.10 Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputy. Following consultation, the designated safeguarding lead should decide on whether to make a request for service to B&NES (or the appropriate local authority) Children's Services via the Triage Team. Staff are also able to make a referral directly to Children's Social Services if they want to.

9.11 Where the risks identified do not meet the threshold for a strategy meeting but there is concern that a section 17 child in need assessment might not be the right course of action, the concern is passed on to B&NES MASH team to gather relevant information from other agencies in order to make the recommendation of which route to pursue.

9.12 The Triage Team will inform the school of the outcome of any referral within 24 hours of receipt.

## 10. What to look out for and when to be concerned

10.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify children who may be in need of help or protection. If staff are unsure, they should always speak to the DSL.

10.2 Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (Child-on-Child abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. Some children are at greater risk of harm than others, both **online and offline.**

10.3 Staff, Trustees and other volunteers should be aware of the four main categories of child abuse which are commonly identified:

•**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

•**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

•**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily through a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as Child-on-Child abuse) and is covered in greater detail later in this policy (section 20).

•**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

10.4 Other forms of abuse which staff, trustees and volunteers should be aware of are:

- •Children are absent from education for prolonged periods and/or repeated occasions.
- •Child sexual exploitation (CSE)
- •Child criminal exploitation (CCE)
- •County lines
- •Domestic abuse
- •Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- •Forced marriage
- •Radicalisation
- •Child-on- Child
- •Sexual violence and harassment (including up-skirting)

Further information is provided in Appendices 2 and 3 of this policy and in Part 1 and Annex B of KCSIE.

## 11. Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between young people outside this environment. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, and serious youth violence.

## 12. Signs of abuse

12.1 All staff need to be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL). Staff should use CPOMs to inform the DSL team of any concerns they might have.

12.2 Possible signs of abuse include (but are not limited to) the following (and these do not necessarily mean that abuse is occurring):

- the child discloses that they have been abused, or asks a question which gives rise to that inference
- the child has an injury that cannot be reasonably or consistently explained, or is unusual in type or location
- the child shows signs of injury on a regular or patterned basis
- the child engages in extreme or challenging behaviour or there is a sudden change in the child's behaviour
- the child asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
- the child appears neglected (e.g. dirty, hungry, inadequately clothed)
- the child appears reluctant to return home or has been openly rejected by parents or guardians
- the child's development is delayed in terms of emotional progress
- the child withdraws emotionally – showing a lack of trust in adults
- the child shies away from being touched or flinches at sudden movements
- the child loses or gains weight

12.3 Further guidance is provided in Appendix 2.

Other sources of information on the signs of abuse include: the DfE advice note What to do it you're worried a child is being abused (2015) and the NSPCC website: NSPCC | The UK children's charity | NSPCC.

## 13. Listening to children and record keeping

13.1 The School provides a range of opportunities for children to be listened to. Children can speak with their Tutors, Housemaster/mistress, class teachers, our nursing team, Lay Chaplain, a member of the Pastoral team or make use of the School counselling service. Contact details for external agencies such as Childline and NSPCC are available on Notice Boards which are prominently on display throughout the School – along with photos of who the children can talk to on the safeguarding/pastoral team.

Staff are reminded to think about the terminology they use when talking with students.

- 'Victim' is a widely understood and recognised term, but not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. You should be prepared to use any term the child feels most comfortable with when managing an incident

- 'Alleged perpetrator(s)' and 'perpetrator(s)' are widely used and recognised terms, but you should think carefully about what terminology you use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too. You should decide what's appropriate and which terms to use on a case-by-case basis.

13.2 If a child discloses that they have been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen
- make it clear that they're not creating a problem by reporting **any** form of abuse/neglect
- listen carefully to the child and keep an open mind -do not interrupt or be afraid of silences
- limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoiding leading questions (such as, "has this happened to your siblings?") that may prejudice an investigation
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the child has been abused
- reassure the child, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy
- discuss the conversation with the DSL as soon as possible, and take no further action unless instructed to do so by the DSL, DDSL or Headmaster
- only share information on a need-to-know basis
- make a full written record of the conversation as set out below.

13.3 Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible on CPOMS. The recording must be a clear, precise and factual account of the conversation or observations.

Where a child has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done, by whom and in whose presence
- any noticeable non-verbal behaviour or words used by the child.

Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer. The DSL or DDSL will organise for the evidence to be scanned and added to the CPOMS incident record.

Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is available on what to do if viewing an image is unavoidable on:

•Searching, screening and confiscation at school - GOV.UK (www.gov.uk)

•Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) (December 2020).

## 14. Procedure to be followed by staff if they have concerns about a child's welfare

14.1 If a member of staff has concerns about a child's welfare, including any mental health concerns, they must inform the DSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section Allegations against members of staff (including supply staff) and volunteers below should be followed. Staff should not assume that somebody else will act and share information that might be critical in keeping a child safe.

14.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

14.3 Prior Park College will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM:

- Where a student makes a disclosure of FGM, the school will follow the mandatory reporting rules and make appropriate referrals to the police as set out in the B&NES guidance available at BCSSP & LSAB Female Genital Mutilation Guidance (March 2019)

- All concerns around FGM, including any disclosure made by a student, will be discussed with the designated safeguarding lead before any action is taken.

14.4 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

14.5 Parents can report to the DSL on the welfare of any child in Prior Park College, whether they are their own child or not. If preferred, parents may discuss concerns in private with the child's class teacher or other member of staff, who will notify the DSL.

14.6 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

## 15. Duties of the DSL on being notified of a concern about a child's welfare

15.1 When the DSL is notified of any concerns about a child's welfare, either in person or via CPOMS, they will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.

15.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child
- the nature and seriousness of the complaint
- contextual factors
- the referral threshold set by the BCSSP
- the child's wishes or feelings
- the inter-agency procedures of the relevant Local Safeguarding Children Partnership
- where relevant, local information sharing protocols relating to Channel referrals.

15.3 If the DSL decides not to make a referral, but to support the child with early help, the DSL will keep the situation under review and consider a later referral to children's social services if the child's situation does not appear to be improving.

15.4 Members of the Safeguarding team are responsible for maintaining written safeguarding records once an issue has been logged on CPOMs. These records are confidential and the only personnel within the School who have access to them are the DSL/DDSLs and the Headmaster. Such records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any actions taken, decisions reached and the outcome.

## 16. Making a referral to children's social services

16.1 When a child is not considered at risk of harm but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the child lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

16.2 Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early-help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

16.3 Where possible, a decision to refer a student to B&NES Children's Services, or the appropriate local authority, should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral and any member of staff may make a referral if this is necessary, but staff should discuss the matter with a member of the senior management team and take advice from the Duty social worker. The designated safeguarding lead should be informed as soon as possible.

16.4 Referral should be made online HERE

16.5 Urgent child protection referrals will be accepted by telephone but must be confirmed in writing immediately via the correct form.

16.6 Where there is any doubt about whether the concerns raised meet the threshold for a child protection referral, the designated safeguarding lead may discuss the case on a "no names" basis with a social worker from the Triage Team or the Link Worker assigned to the school to obtain advice on how to proceed.

16.7 Parental consent must be sought prior to the request for service being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.

16.8 If the child already has an allocated social worker, the referral should be made directly to them. You do not need to complete another Request for Service form an email can be sent directly to the allocated social worker copying in their line manager also. If the child lives outside B&NES, a referral should be made to their home local authority.

16.9 All referrals will be acknowledged by the Triage Team within 24 hours.

16.10 If the school/college does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with Children Services via the designated safeguarding lead. BCSSP Escalation Policy

16.11 If a child is in immediate danger or is at risk of harm, a referral should be made to children's social services and/or the police immediately. Further guidance on when to call the police is provided by the NSPCC - when to call the police. The School is not required to obtain parental consent prior to a referral being made.

16.12 If the initial referral to the local authority is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.

16.13 Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.

16.14 If, after a referral, the child's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up, to ensure both that their concerns are addressed, and that the child's situation improves.

16.15 Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is

vulnerable to being drawn into terrorism. Referrals to the Channel panel requires the consent of the person receiving support. The School will respond to requests for information from the police promptly, and in any event within five to ten working days (see the School's Prevent Policy).

16.16 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it.

16a **Attendance at case conference and core groups**

The designated safeguarding lead will liaise with Children's Services to ensure that all relevant information held by the school is provided to Children's Services during the course of any child protection investigation.

The designated safeguarding lead will ensure that the school is represented at child protection case conferences and core group meetings:

- a report will be provided for all child protection case conferences and shared with the parents / carers for the child in advance of the report being provided to the safeguarding administration team. Reports for Initial Child Protection Conferences should be shared no later than two working days before the conference and for Review Conferences, five working days before
- where possible, a member of staff who knows the child best, such as a class teacher of head of year will be nominated to attend
- failing that, the designated safeguarding lead or their deputy will attend
- if no-one from the school can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting which will include a recommendation as to the need for a child protection plan.

16b **Monitoring**

Where a student has a child protection plan in place and the school has been asked to monitor their attendance and welfare as part of this plan.

- monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead and this will be shared in preparation for the conference or with the social worker if needed separately to the conference
- the completed monitoring information will be kept on the student's CPOMS file and copies made available to all conferences and core group meetings
- the designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing and will report to other Council staff as required.

## 17. Informing parents

17.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer (LADO), children's social services, the police and/or the Headmaster before discussing details with parents.

17.2 For Channel referrals, the DSL will consider seeking the consent of the child (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

17.3 For the avoidance of doubt, referrals do not require parental consent. Staff must act in in the best interests of the child, even if this means making a referral against the parents' wishes.

## 18. Allegations about members of staff, supply staff, contractors and volunteers

### 18.1 **Guidance to staff**

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a child.

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then the school will follow the Managing Allegations Against Staff or Volunteers protocol set out in the Southwest Child Protection Procedures. Contacting the Local Authority Designated Officer within one working day of an allegation being made. The LADO can be contacted by email on LADO@bathnes.gov.uk and the referral form can be found HERE

Allegations Against Staff or Volunteers (proceduresonline.com)

- The Headmaster is the school representative for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

- All allegations in relation to staff members will be referred to the Headmaster; allegations against the Headmaster will be referred to the Chair of Trustees (contact details in part 1 of this policy).

### 18.2 **Allegations against Staff or Volunteers**

This guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers, has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (e.g. domestic violence at home).

These criteria are often referred to as the allegation or harms threshold. The procedures outlined below aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part 4 of KCSIE (September 2025).

The concerns should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect). These will include concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see ss16-19 **Sexual Offences Act 2003**)
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 **Sexual Offences Act 2003**)
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature (e.g. inappropriate text / e-mail messages or images, gifts, socialising etc)
- Possession of indecent photographs / pseudo-photographs of children

18.3 **Reporting an allegation about staff**

Where an allegation is made about a member of staff, supply staff, the DSL, contractor or volunteer, the matter should be reported immediately to the Headmaster or in the Headmaster's absence, to the Nominated Safeguarding Trustees. The adult to whom the allegation relates should not be informed without the explicit consent of the Local Authority Designated Officer (LADO), the person designated by the local authority to be involved in the management of allegations against people who work with children.

- Allegations about the Headmaster should be reported to the Chair of Trustees (contact details in section 1 of this policy) without first notifying the Headmaster.
- Allegations about a Trustee should be reported to the Chair of Trustees. If the allegation is against the Chair of Trustees, the matter should be reported to the Nominated Safeguarding Trustee.
- The Headmaster or Chair of Trustees who receives any such allegation is referred to in these procedures as the 'case manager'.
- If we receive an allegation relating to an incident where an individual or organisation has been using the school premises for running an activity for children, we will follow our safeguarding policies and procedures and inform the local authority designated officer (LADO), as we would with any safeguarding allegation.

18.4 **Action to be taken by the case manager**

Before contacting the LADO, the case manager will conduct basic enquiries in line with the Managing Allegations Against Staff or Volunteers protocol set out in the Southwest Child Protection Procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation.

If the case manager is unsure whether the allegation meets the criteria, the LADO will be consulted for advice.

Any allegations meeting the criteria will be dealt with in accordance with the local authority's arrangements for managing allegations. All such allegations must be dealt with as a priority to avoid any delay.

The case manager will immediately (and in any event within one working day) discuss the matter with the LADO before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to formally investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.

In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.

Where an adult makes an allegation to the School that they were abused as a child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a child will be reported to the LADO in line with BCSSPs procedures for dealing with such allegations. The LADO will then coordinate with children's social care and the police.

18.5 **Disclosure of information**

The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, children's social care and the police.

The parents of the child involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child: no information can be shared regarding the member of staff.

The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

18.6 **Investigation**

Investigations will usually be undertaken by a senior member of School staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.

Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.
It is recognised that the School may have to consider an allegation against an individual not directly employed by the School: for example, supply staff provided by an employment agency or business. Prior Park College will ensure allegations are dealt with properly. Prior to ceasing using a supply member of staff due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome.

The School may discuss with the agency whether it is appropriate to suspend the person they have supplied, or redeploy them, whilst the investigation is carried out. Prior Park College may take the lead in the investigation, to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to children or other school staff. They would therefore not be able to collect the facts or liaise with the LADO, police and/or children's social services. Supply staff will be advised to contact their trade union for representation. If there is an allegation meeting, it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School.

The School will not cease its investigations if the person involved leaves, resigns, ceases to provide their services, or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of the investigation process.
In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the investigation.
- **False**: there is sufficient evidence to disprove the allegation
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

18.7 **Support**

The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case.

The School will also provide access to counselling or medical advice, where appropriate.

The School will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may be prejudicial to the gathering and presentation of evidence.

Support will also be offered to the child(ren) affected and their parents or guardian. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most suitable and effective way.

18.8 **Suspension**

Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect that a child, or other children at the School, is/are at risk of significant harm, or where the allegation is so serious that it might be grounds for dismissal.

The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the child with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.

If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.

If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this, for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the child who made the allegation.

18.9 **Confidentiality and information sharing**

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality, in order to ensure a fair investigation with minimum impact on all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication, in whatever form, which is addressed to the public at large or any section of the public.

The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make the parents or guardian of the child involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, or when, it arises

Where the police are involved, wherever possible the School will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by Prior Park College.

18.10 **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation by a child is determined to be unsubstantiated, unfounded, false or malicious, the case manager should consider the following actions:

- If the child who made the allegation is in need of help or may have been abused by someone else and, under such circumstances, whether a referral to child's social services is appropriate
- whether to take disciplinary action against the child in accordance with the School's Behaviour Policy.

If a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the School or a member of staff unreasonably.
Whether or not the person making the allegation is a child or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

18.11 **Substantiated allegations**

If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the School.

Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her services, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.

If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulatory Authority. The School will follow the advice set out in the TRA documents: Teacher misconduct: information for teachers and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.

At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the Trustees without delay.

18.12 **Charity Commission**

Prior Park Schools as a registered charity has a duty to protect people who come into contact with its work as a charity from abuse or mistreatment of any sort. As part of this duty the School is required to notify the Charity Commission of serious incident involving children or other beneficiaries of the charity. Examples of where such a report would be required include (but are not limited to):

> *incidents (alleged or actual) where children have been abused or mistreated whilst under the School's care or by individual(s) connected to the School or failures to follow policies and procedures which have put children at significant risk of harm*

It is the responsibility of the Board of Trustees to ensure such reports are made promptly. The report will include circumstances of the incident, actions taken by the School and details of lessons to be learnt from the subsequent review.

The Trustees will also ensure that an action plan is put in place to ensure any deficiencies or weaknesses in the School's safeguarding arrangements are remedied without delay.

18.13 **Record keeping and references**

Details of allegations that are found to be malicious or false will be removed from personnel records, unless the individual gives their written consent for the retention of the information. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).

When providing employer references, Prior Park College will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious

## 19. Low-level concerns

19.1 Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. A "low-level" concern is any concern –no matter how small, and even if no more than causing a sense of unease or a nagging doubt –that an adult has acted in a way that:

- is inconsistent with the School's 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.

*NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.*

19.2 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to:

- being overly friendly with children
- showing favouritism
- taking photographs of children on a personal device
- or using inappropriate humiliating, intimidating or offensive language.

19.3 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the DSL/Headmaster using the 'low-level' concern form on the staff portal.

Where the concern relates to the Headmaster, it should be reported to the Chair of Trustees. Such reports should be made without undue delay.

Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Headmaster/Chair of Trustees when the concern is reported to them and if required, through discussions with the LADO.

If there is a conflict of interest in sharing a low-level concern with the DSL and Headmaster, the low-level concern should be shared with the Chair of Trustees via the Director of Operations and Finance, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

19.4 Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

19.5 If the DSL/Headmaster is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern or in fact meets the harm threshold, they should consult with their LADO.

19.6 A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the DSL/Headmaster as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

19.7 All low-level concerns, including those determined to be unfounded, will be recorded in writing by the DSL and Headmaster. The record will include details of the concern, the context in which the concern arose, and any actions taken, decisions reached and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL/Headmaster in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the School.

19.8 Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred too.

19.9 Records of low-level concerns will be reviewed at least termly by the DSL, Headmaster and Head of Compliance (along with HR if required) to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required.

19.10 The number of Low-Level Concerns, brief context and actions taken are shared with the Local Governance Committee, termly.

## 20. Arrangements for dealing with child-on-child abuse and allegations

20.1 Most instances of children causing harm to each other will be dealt with under the School's Anti-Bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a child towards another (sometimes referred to as child-on-child abuse). This type of abuse can happen both inside and outside of School and online.

Abuse in intimate relationships between children is sometimes known as 'teenage relationship abuse'.

Examples of children' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical violence such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- up-skirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress. (Up-skirting is now a criminal offence. Anyone of any gender can be a victim.)
- consensual and non-consensual sharing of nude and/or semi-nude images and/or videos (also known as sexting, or youth-produced sexual imagery)
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

20.2 Child-on-child abuse also often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

20.3 Children with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse.

20.4 Whilst sexual violence and sexual harassment are forms of child-on-child abuse to which the comments and measures below concerning awareness, education and reporting apply, their particular nature requires extra commentary, which is provided in section 21.

20.5 Prior Park College has an important role in developing children' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- Making it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, and that failure to do so can lead to a culture of unacceptable behaviour and in the worst case scenario, a culture that normalises abuse
- enforcing the behaviour policy, which is explicit about the high standards of behaviour and courtesy the School expects
- being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing any form of child-on-child abuse as 'banter', 'just having a laugh' or 'boys being boys'
- implementing the School's Anti Bullying Policy.

PPC is committed to ensuring that its response to any reports of child-on-child abuse is part of on-going proactive work and whole school approach and embed best practice and take a contextual whole-school approach to such abuse.

The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all staff, Trustees, contractors and volunteers, parents and students about this issue. This includes:
    - Training all Trustees, members of the Senior Leadership Team (SLT), staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes (
        - Contextual Safeguarding
        - the identification and classification of specific behaviours
        - the importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever

dismissed as horseplay, teasing, 'boys will be boys' or 'banter'. Training includes case studies which the staff design themselves.

- Educating children about the nature and prevalence of child-on-child abuse via PSHCE, Assemblies, Tutor and House time, Lessons and the wider curriculum.
- Students are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.
- Ensuring that all child-on-child abuse issues are fed back to the DSL and Safeguarding team so that they can spot and address any concerning trends and identify students who may need additional support. This is done by sharing of pastoral and safeguarding information on CPOMS, weekly team meetings, and sharing of bullying incidents in the Bullying Log. Logs are cross-referenced and checked against SEND and other pastoral information.
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom). This is done via PSHCE, Assemblies, tutor time and internal and external speakers.
- Working with Trustees, the SLT, all staff and volunteers, students and parents to address equality issues, to promote positive values, and to encourage a culture of respect amongst all members of the School community. This is done via PSHCE, Assemblies, tutor time, the School charity programmes, School outreach work; promotion of the School ethos of respect for diversity and inclusion.
- Creating conditions in which students can aspire to and realise safe and healthy relationships. This is done through PSHCE, Assemblies, tutor time, Relationships and Sex Education (RSE), Parents' Forum and specific pastoral events for parents and students
- Creating a culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to. This is done via a culture of openness. There are pastoral offices for discussions with students, open door policies from HsMs, Tutors and pastoral staff, Boarding staff, Health and Wellbeing leads, peer mentors, the School Counsellors, the PSHCE programme and Mindfulness courses.
- Responding to cases of child-on-child abuse promptly and appropriately.

20.6 If a child discloses that they or another child has been the victim of child-on-child abuse, the guidance for gathering and recording the information provided in Section 12 of this policy should be followed.

20.7 If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (i.e. where there is reasonable cause to suspect a child is suffering or is likely to suffer significant harm), the case will be referred to the local authority using the procedures set out in this policy.

The School will take advice from children's social services on when and how to inform the child about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all children involved, including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE (September 2025).

20.8 A child against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply.

20.9 If it proves necessary for a child to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the child during the interview.

20.10 Both the victim and the perpetrator will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. The DSL, as part of these procedures, will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other children at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment, appropriate weight will be given to:

- the wishes of the victim (if they wish to be called this)
- the nature of the alleged incident
- the ages of those involved
- whether the incident was an isolated one or part of a pattern
- any power imbalance between the victim and perpetrator
- any ongoing risks to the victim and other children
- and any relevant contextual factors.

Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

20.11 Where the harm is attributable to sexually abusive behaviour or sexual harassment, the school will follow the B&NES Harmful sexual behaviour procedure

## 21. Child-on-child sexual violence and sexual harassment

21.1 Sexual violence includes acts such as sexual assault, assault by penetration, and rape (this may include an online element which facilitates, threatens and/or encourages sexual violence). A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

21.2 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names etc
- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), up-skirting, displaying pictures, drawings or photos of a sexual nature
- Online harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes), unwanted sexualised comments and messages

21.3 Sexual violence and sexual harassment can occur between children of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, children with SEND, and LGBTQ+ children are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

21.4 Children may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

21.5 All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report, or their experience minimised.

21.6 Section 13 of this policy provides general guidance for listening to children and record-keeping. Effective safeguarding practice in the context of claims of sexual violence or harassment further requires the following:

- If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
- Where the report includes an online element, staff should know and following the searching, screening and confiscation advice (for schools) and UKCIS advice on sharing nudes and semi-nudes. The key consideration is for staff not to view or forward illegal images of a child. The UKCIS advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

21.7 The School will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the School. The DSL/DDSLs are likely to have a complete safeguarding picture and be the most appropriate people to inform the School's initial response.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB (harmful sexual behaviour) has been displayed; the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children (e.g. whether the alleged perpetrator(s) significantly older, more mature or more confident)
- whether the victim has a disability or learning difficult
- whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers; whether there are ongoing risks to the victim, other children, or School staff
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

21.8 The DSL will reach a judgement about which of the following four ways is the most appropriate for handing the case:

- Internal management: handled entirely within the School.
- Early help: where the children concerned do not require referral to statutory services but may benefit from assistance from an external agency.
- Children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
- Report to the police: in addition to the above, where the seriousness of the concern merits it.

In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority MASH (Multi Agency Safeguarding Hub) team and/or the police. The School will follow the guidance as set out in detail in KSCIE (2025), Part 5. Further support includes Lucy Faithfull Foundation's "Shore Space" which is a confidential chat service for young people dealing with sexual behaviour concerns, into safeguarding curriculum and staff resources.
The Centre for Expertise on Child Sexual Abuse (CSA) and The Children's Society are effective support materials for all staff.

21.9 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where children have a health need arising from sexual assault or abuse, the School will assist them in gaining access to suitable specialist support services.

21.10 If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the student who made the allegation and/or whether a referral to children's services is appropriate.

**Upskirting**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim

## 22. Other safeguarding arrangements

22.1 **Mental health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff should also recognise attendance as something which can be impacted by mental health. Where young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the Deputy DSL, Mr Dave Sackett, and/or Mr Toby Marshall who are the Mental Health Leads at Prior Park College, who may in turn contact an appropriate external agency.

22.2 **Children with special educational needs and disabilities or physical health issues**.

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. All staff should be aware of the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges.

To address these additional challenges, staff at PPC should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Further information can be found in the Department's: SEND Code of Practice 0 to 25 and Supporting Students at School with Medical Conditions.

And from specialist organisations such as:

- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: Find your local IAS service (councilfordisabledchildren.org.uk)

- Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people

22.3 **Online safety**

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it has become a significant component of many safeguarding issues, including child exploitation, radicalisation and sexual predation. Issues of online safety can be broadly categorised into four areas of risk:

1. **Content**: Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, and lifestyle sites that promote anorexia, self-harm or suicide. Content risks now also include misinformation, disinformation (including fake news), and conspiracy theories.
2. **Contact**: Being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **Conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your children or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measures are routinely reinforced in lessons, houses and boarding houses. The School manages access to the internet using filters and monitoring systems to ensure the School's network and IT equipment are being used in a safe and appropriate manner.

When the School communicates with parents the importance of online safety is reinforced, this includes the Filtering and Monitoring systems we have in school to monitor online safety both in school but also on the child's school PLD when they are off site, sites their children may need to visit and why, as well as bespoke information evenings on topics such as online bullying etc.

The school use the DfE's "Plan Technology for Your School" tool for self-assessment of our filtering and monitoring system. The school reviews the effectiveness of our filtering and monitoring systems in each safeguarding meeting to ensure we respond to flagged concerns promptly. Generative AI is now acknowledged as a potential risk. PPC references DfE's "Generative AI: product safety expectations" guidance when updating filtering/monitoring protocols.

**Filtering and monitoring**

PPC understands the risks associated with children accessing uncensored material online. Therefore, the school has different levels of filtering and monitoring in place for school devices and on the school network to ensure the safety of our children when online. The parameters of the filtering and monitoring block harmful and inappropriate content without unreasonably impacting teaching and learning.

These are:

- Cisco Meraki - the school's network system has content filtering in place which has been set up to ensure children are not able to access, via the internet in school, inappropriate content.
- Bitdefender – this has been installed on all school owned devices and is an end point security system that protects against virus/malware threats that could expose children's data, as well as providing a further layer of content filtering.
- Securly – this filtering and monitoring system monitors the low-level detail of what the children are typing and accessing and ensures that children are not able to access uncensored web content. Securly will inform the safeguarding and IT teams of any attempt to access inappropriate content so that it can be followed up. Additionally, it will log any concerning activity for the safeguarding team to follow up with the child.

Responsibilities:

- All staff are responsible for
    - monitoring the usage of devices and the contact children are accessing. Staff should show their professional curiosity when children are online by looking at their screens and supporting their web searches
    - Teaching children about responsible digital behaviour, ethics and the consequences of inappropriate online actions
    - Report if witness or suspect unsuitable material has been accessed, or notice abbreviations or misspellings that allow access to restricted materials
- The DSL is responsible for monitoring any safeguarding concerns which are flagged by staff or by the system and following them up in an appropriate way.
- The IT team are responsible for ensuring that the different levels of security are operating effectively. The team will review the filtering and monitoring at least annually and ensure that it is sufficient to meet the changing needs of the children and the internet. The IT team will work with the DSL to ensure the children are safe whilst online.
- The Safeguarding Trustee is responsible for ensuring that the school is fulfilling their responsibilities in this area.

The Safeguarding Team works closely with the IT department to monitor the effectiveness of the filtering and monitoring in place. This includes an annual review/audit of the provision. Schools have access to, and may choose to use, the DfE 'plan technology for your school service' Plan technology for your school - GOV.UK

**Cyber Attacks**

PPC understands that it is directly responsible for ensuring they have the appropriate level of security protection procedures in place in order to safeguard our systems, staff and learners. These are reviewed annually to ensure the school keeps up with evolving cyber-crime technologies.
Guidance on e-security is available from https://nen.gov.uk/
Additionally, the school will consider taking appropriate action to meet the cyber security standards for schools and colleges to improve resilience against cyber-attacks as set out here:
https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges

22.4 **Risk assessment**

The School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of children. Risk assessments may pertain to the whole School, to specific curricular or Co-Curricular activities that have hazards associated with them, or to individual children or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the School's Health and Safety Policy.

22.5 **Staff recruitment**

The School is committed to safer recruitment processes.

All members of staff, including teaching and non-teaching staff, Trustees, Volunteer, part-time staff, temporary and supply staff, and visiting staff such as musicians and sports coached are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE.

- For most appointments, an enhanced DBS check with 'barred list' information will be required. We will inform shortlisted candidates that we might conduct an online search as part of due diligence checks in the recruitment process.
- The single central record (SCR) must indicate if a standalone children's barred list check was completed, and a certificate obtained (previously it was just a 'barred list check')

At least one member of any staff recruitment panel will have had Safer Recruitment training. The School's separate Safer *Recruitment Policy* contains further details about how the process of staff recruitment is conducted.

22.6 **Children who are absent from education or home educated**

Prior Park College understands the need to be aware of those children who are persistently absent, have prolonged periods of absence or missing from school as this may be an indicator of welfare concerns and could have an impact on their mental health. The guidance Working Together to Improve School Attendance is now statutory. PPC always escalates to children's services where absence raises safeguarding concerns

Our *Registration and Attendance Policy* states clearly who needs to be notified and what action should be taken and any relevant timescales.

Schools should refer to Attendance & Welfare Support Service | The HUB (bathnes.gov.uk) for further details.

Where a parent notifies the school that they are removing the child so they can be educated at home, the following notifications should be made:

- The CMEO must be notified of all decisions.
- If the child is already known to B&NES Children's Services, their allocated social worker should be notified immediately
- If the child is not known to B&NES Children's Services, but the school has concerns about their welfare, the designated safeguarding lead should make a referral to B&NES Children's Services.
- If the child has an EHCP, the local authority will need to be informed so they can review the plan, working closely with parents and carers.
- When placing students in alternative provision, the school must obtain written confirmation that appropriate safeguarding checks have been conducted for all AP staff. The provider will inform the school of any staff or arrangement changes that may pose a risk. AP placements must be reviewed at least half-termly for attendance and safety; schools remain responsible for safeguarding at all times. The school must record the location/address of each AP setting and satellite site.
- Before a child is removed from school for elective home education, particularly vulnerable children, a coordinated meeting must take place to address any safeguarding risks (see Registration and Attendance Policy). Virtual School Heads now also support children in kinship care, beyond those in local authority care.

**Note: In line with the latest version of KCSIE, it is the School's policy to hold a minimum of two emergency contact numbers for each child.*

22.7 **The Prevent Duty**

- All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. All schools should recognise the children/people who are 'susceptible' to extremist ideology and radicalisation.

There are four specific elements to Prior Park College's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment –working with the Local Authority, who provide contextual information about the area, the School assesses the risk of children being drawn into terrorism, including extremist ideologies
- Working in partnership –liaising closely with the BCSSP to ensure children requiring support are referred at a suitably early stage
- Staff training –enabling staff to identify children susceptible to being drawn into terrorism and to challenge extremist ideas
- IT policies–to provide guidance to children as to how to stay safe online (see the School's E-Safety Policy) and set out the filtering and monitoring mechanisms in place.

Prior Park Schools Prevent Policy contains further details about how the School fulfils the statutory requirements imposed by the Prevent Duty.

22.8 **Visiting speakers**

Prior Park College often invites speakers from the wider community to give talks to enrich our students' experience. The School recognises the enormous benefit gained by students from speakers from all walks of life. Both the school and students greatly appreciate the time and effort that Visiting Speakers put into their presentations.

The Prevent statutory guidance (https://www.gov.uk/government/publications/prevent-duty-guidance ) expects all schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. This policy was therefore drawn up having had regard to the Government's Prevent Duty guidance and the School's wider safeguarding obligations.

Prior Park College's responsibility to students is to ensure that they can critically assess the information that they receive as to its value to themselves, and that such information is aligned to the ethos and values of the School and British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Once the visiting speaker has been approved by the Assistant Head (Co-curricular) the member of staff organising the visiting speaker (known as the Responsible Person- RP) will undertake a risk assessment this will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant. The RP may also conduct research on the Visiting Speaker and/or their organisation, as appropriate. We will not use a Visiting Speaker where any link is found to extremism, such as extremist groups and movements.

A member of school staff will be present during the visit/talk, who will monitor what is being said to ensure that it aligns with the values and ethos of the school and British values. In the unlikely event that the talk/presentation does not meet this requirement, Visiting Speakers will be informed that school staff have the right and responsibility to interrupt and/or stop a presentation. The member of staff will report this to the Deputy Head Pastoral and Assistant Head, Activities as soon as reasonably practicable after the talk/visit.

Visiting Speakers will be supervised by a School employee whilst on School site. At no point will a Visiting Speaker be left unsupervised on School site whilst students are present.

See Prior Park College's *Visiting Speaker Policy* for further information.

22.9 **Confidentiality and information sharing**

Prior Park College will keep all child-protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child-protection investigations.

Where a child who is subject to a child-protection plan is moving to another school, the DSL will ensure their child-protection file is securely transferred as soon as possible. This file will be transferred separately from the main child file to the DSL at the new school and confirmation of safe receipt will be obtained. The file will be transferred according to the following: 5 days for an in-year transfer, or within the first 5 days of the start of a new term to allow the new school/college to have support in place when the child arrives

The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving: for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including educational outcomes. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis.

Further non-statutory guidance Information Sharing was published by the Government in July 2018. See Appendix 4.

21.10 **Whistleblowing**

All staff are required to report to the Headmaster any concerns about:

- poor or unsafe safeguarding practices at the School;
- potential failures by the School or its staff to properly safeguard the welfare of children;
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

If the member of staff feels unable to raise their concern with the Headmaster (or a member of the Senior Leadership Team) or if they believe any concern has not been dealt with, they should contact the Chair of Trustees. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see section 1 for contact details).
Any member of staff can whistle blow without fear of detriment (retribution or disciplinary action), provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

22.12 **School premises, security and visitors**

All visitors, no matter what their definition, must be given relevant safeguarding and fire related procedures and information when they arrive on site.

The School will take all practicable steps to ensure that all School buildings are as secure as circumstances permit.
The School buildings have CCTV cameras at their main entrances and other locations. Staff need to use their staff ID cards as swipe cards to gain access to School buildings.

All staff are identified by photo ID cards, which are worn at all times during School-related activities and duties, on a blue lanyard.

Any visiting professionals, contractors, volunteers, agency/supply staff and alumni are signed in at reception and the process for this is as defined in the *Visitors and Contractors Access and Supervision Policy*.

People on site are defined according to the level of checks which have taken place and they are given a coloured lanyard to reflect this:

- **BLUE:** member of staff, fully vetted and able to work freely
- **YELLOW:** Unchecked visitor (must be supervised at all times)
- **GREEN:** Checked visitor (can work unsupervised)
- **ORANGE:** Trustee, fully vetted and able to work unsupervised

**Parent:** prospective and current parents, carer and/or guardian of children attending/applying for one of the schools but will not be left unsupervised

22.12 **Behaviour management, physical intervention and restraint**

Prior Park College has a Behaviour Policy which staff should follow. Any use of physical intervention and restraint will be linked to the implementation of the school's behaviour policy and Use of Physical Restraint Policy.

Staff at Prior Park College will use physical intervention and restraint only in line with the schools policy and the child's specific plan.

Guidance from the Department of Education provides schools with the powers to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at:

- Behaviour and discipline in schools - Publications - GOV.UK
- B&NES policy on physical intervention and restraint

Physical intervention and restraint on students should only be used as a very last resort, normally when de-escalation strategies have failed, and when there is a clear risk of serious harm to the student or others or serious damage to property.

Decisions on when to use physical intervention is a matter of professional judgement, and any intervention or restraint should be proportionate, reasonable and necessary to the perceived risk and should continue only for as long as the risk remains.

Should such an intervention be required staff should record the details on CPOMS, including any injury, and contact the parent/carer on the same day to explain the circumstances involved.

22.13 **Photographs and Images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have safeguarding processes in place. All staff are asked to read the *Taking, Storing and Using Images Policy* and follow the processes set out in it.

22.14 **Specialist settings**

The School has many specialist settings such as 1:1 lessons, performing arts and music rehearsal areas. Staff are given guidance detailing the additional measures taken to safeguard for example in 1:1 or offsite tuition and performances away from the School. This information can be found in the *Staff Code of Conduct Policy*.

22.15 **Monitoring this Policy**

- Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report to the Trustees. Where an incident involves a member of staff, the LADO will be asked to assist in this review, to determine whether any improvements can be made to the School's procedures. The DSL will monitor the content and operation of this policy and present an annual report to Prior Park College's Local Governance Committee and Prior Park Schools Board of Trustees.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a termly report to the Local Governance Committee, as part of the Headmaster's Report.
- Prior Park School's Board of Trustees will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The Trustees will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Prior Park School's Board of Trustees will approve this policy annually, and will use KCSIE, NMS Boarding and the ISI Safeguarding Policy checklist as an aid.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

22.14 **Other relevant policies**

The following policies should be read in conjunction with this policy:

- Anti-Bullying Policy
- Health and Safety Policy
- Educational Visits Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Behaviour Policy
- Exclusions Policy
- E-Safety Policy
- IT acceptable Use Policy
- Raising a Concern at Work 'Whistleblowing' Policy
- Student Supervision Policy
- Missing Child Procedure
- Mental Health and Wellbeing Policy
- Prevent Duty Policy
- Mobile Phone Policy
- Relationships and Sex Education Policy

- Child-on-Child Abuse Policy
- Low-Level Concerns Policy
- Visiting Speaker Policy
- Registration and Attendance Policy
- Visitors and Contractors Access and Supervision Policy
- Use of Restraint Policy
- Safety and Supervision on School Journeys Policy
- Visitors and Overnight Guests in Boarding Accommodation
- Taking, Using and Storing Student Images Policy.

**ALL STAFF WHO WORK DIRECTLY WITH STUDENTS MUST READ ANNEX B OF KCSIE- APPENDIX 1 OF THE PPC SAFEGUARDING POLICY IS REPLICATED FROM ANNEX B.**

**Appendix 1: Other types of abuse**

**Children who are absent from education:** all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child who is are absent from education for prolonged periods and/or repeated occasions can act as a vital warning sign of a range of safeguarding possibilities. These include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation (FGM), 'honour'-based abuse or risk of forced marriage.

Children who are absent from education are different to children missing education. Children missing education' is the next step up from 'Children being absent from education' who may not be attending or may have patterned absence for a variety of reasons. Children absent from education can be impacted by mental health or EBSA (Emotional Based School Avoidance).

Prior Park College will report to the Attendance and Welfare Support Service or the Local Authority instances of prolonged unauthorised absence, or a child being removed from the School roll under the circumstances outlined in KCSIE. In cases where a child has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the child as outlined in our 'Registration and Attendance' policy.

Schools should refer to B&NES "Children missing from education" policy and the B&NES missing children protocol for further details.

**Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):** Both CCE and CSE are forms of abuse that occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or (c) through violence or threat of violence. An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic and other resources.

Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. More detailed definitions of CCE and CSE are given below:

- CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The victim (male or female) may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- CCE is where is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity The victim may have been criminally

exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or being forced or manipulated into threatening/committing serious violence to others.

**Child abduction and community safety incidents**: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

**Children and the court system**: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

**Children with family members in prison**: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

**County lines:** "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK -no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, student referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered (via the National Referral Mechanism) alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

**Cybercrime:** Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking');
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources;

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- How to Protect Children From Domestic Abuse | NSPCC
- What about my children? - Refuge Charity - Domestic Violence Help
- Home | Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)

**FGM:** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. All staff must be aware of the law requiring teachers to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023, it's been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

**Homelessness**: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.
The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homelessness Reduction Act: policy factsheets - GOV.UK (www.gov.uk). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: Homelessness Reduction Act: policy factsheets - GOV.UK (www.gov.uk).

**Honour-based abuse (HBA**): So-called 'honour-based' abuse(HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

**Lesbian, gay, bi or trans ("LGBT"):** The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. In some cases, a student who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The School endeavours to provide a safe space for LGBT children to speak out or share their concerns with trusted members of staff.

**Looked after and previously looked after children:** The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

In particular, they should ensure that appropriate staff have access to the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead will keep details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and, through safeguarding training, all staff have the skills, knowledge and understanding to keep previously looked after children safe.

When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Mrs Jill Bendry is the DDSL for LAC and previously looked after children at PPC. She will work with local authorities to promote the educational achievement of registered students who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Statutory guidance: Designated teacher for looked-after and previously looked-after children - GOV.UK (www.gov.uk) contains further information on the role and responsibilities of the Designated Teacher.

**Modern Slavery and the National Referral Mechanism:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk )

**Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if

they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

**Radicalisation and extremism:** Children can be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

"Radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

"Terrorism" is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

"Extremism" is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Extremist views may result in terrorist activity which is where is an action or actions endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts electronic systems. The use of threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There are various reasons why a young person might become interested in extremism:

- a search for answers to questions about identity, faith and belonging
- a desire for 'adventure' and excitement
- a desire to enhance self-esteem of the individual and promote 'street cred'
- the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
- a sense of grievance that can be triggered by personal experiences of racism or discrimination

Prior Park College has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL.

Under Counter-Terrorism and Security Act 2015, the school has a duty to refer young people on to B&NES Channel Panel under the Prevent strategy where there are concerns that they are being radicalised. Where a school/college has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger student may be at risk due to their parent's radicalisation, the school/college will follow the guidance set out in the B&NES guidance "Safeguarding children and young people from radicalisation and extremism"

**Channel:** Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages Someone referred to Channel are required to provide their consent before access to Channel support is given.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK (www.gov.uk).

**Additional support**: The Department has published further advice for schools on the Prevent duty Protecting children from radicalisation: the prevent duty - GOV.UK (www.gov.uk). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty. INTRODUCTION TO PREVENT E-LEARNING PACKAGE
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention. Welcome (prevent.homeoffice.gov.uk)
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel. Welcome (prevent.homeoffice.gov.uk)

Educate Against Hate - Prevent Radicalisation & Extremism, is a government website designed to support school teachers and leaders to help them safeguard their children from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and Trustees/Board members outlining their roles and responsibilities under the duty.

**Serious violence:** All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

**Sexual violence and sexual harassment between children in schools and colleges:** Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

**Sharing nudes and semi-nudes:** The term 'sharing nudes and semi-nudes' refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. It is also known by the names 'youth-produced sexual imagery' or 'sexting'. While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003)and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. Also, consensual and non-consensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Consequently, a member of the DSL team should be notified as soon as possible if an incident comes to light in which a child under the age of 18:

- has created and shared sexual imagery of themselves with a peer under the age of 18;
- has shared sexual imagery created by another person under the age of 18 with another person;
- is in possession of sexual imagery created by another person under the age of 18.

**Additional Support and Advice for Staff**

**Management of an incident:** Any direct disclosure by a child should be taken seriously. Children who make such disclosures are likely to be embarrassed and worried about the consequences. Typically, they will have tried to handle the problem themselves and they will consider notifying a member of staff as a last resort. Given the potential seriousness of the situation, the DSL must be informed as soon as possible. The DSL will conduct an initial review, which will include meeting relevant staff and the children, to consider:

- whether there is an immediate risk to any child or young person;
- if a referral should be made to the police and/or children's social care;
- if it is necessary to view the image(s) in order to safeguard the child –**in most cases, images or videos should not be viewed**;
- what further information is required to decide on the best response;
- whether the image(s) has been shared widely and via what services and/or platforms;
- whether immediate action should be taken to delete or remove images or videos from devices or online services or to confiscate the device used (if possible);
- any relevant facts about the child involved which would influence the DSL's risk assessment;
- whether to inform the parents informed or whether involving them would put young person at risk of harm.

**Viewing the Imagery:** Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. If a device is confiscated, it should be turned off and locked away securely until it is passed on to the DSL or an external agency such as the police. Staff must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. The decision to view any imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to those involved. The DSL must further be satisfied that it is the only way to make a decision about whether to involve other agencies, i.e. that it is necessary (i) to contact a reporting agency (such as the IWF) to have it taken down; or (ii) to support the child or parent in making a report; or (iii) or that is unavoidable because the child has shown it directly to a staff member or because the imagery has been found on School equipment. Along with our own Safeguarding and Child Protection procedures, the School will follow the advice given in Sharing nudes and semi nudes: Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk) (December 2020).

**Referral.** Once the DSL has sufficient information, a decision will be taken over whether the matter should be dealt with internally or referred to children's social care and/or the police. The DSL will be informed by the need to ensure the welfare and protection of the child. Records will be kept of the information available and the rationale for any decisions taken. A referral will always be made to children's social care and/or the police immediately if the incident:

- Involves an adult.
- If there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

**Support.** It is vital that continuing support be given to the child so that they know they are not alone. Children must be advised on how to report sexual images or videos, how to get them taken down and how to delete it from their accounts. Children must also be made aware of the importance of not sharing the image further. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. Children can use the IWF and Childline's Report Remove tool to report images and videos they are worried have been, or might be, shared publicly.

**Deletion of imagery.** If the School decides that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing. In most cases, children should be asked to delete the imagery and to confirm that they have deleted them. Any decision to search a child's device and delete imagery should be based on the professional judgement of the DSL.

**Recording incidents.** All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to external agencies and those that have not been reported out to police or children's social care. Copies of imagery should not be taken

**Virtual Head:** Virtual school heads manage student premium plus for looked after children. The designated teacher works with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children.

Statutory guidance on Promoting the education of looked-after and previously looked-after children - GOV.UK (www.gov.uk) contains further information on the roles and responsibilities of virtual school heads.

In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

## Appendix 2: Further information on signs of abuse

### Physical abuse

| Physical signs | Behavioural signs |
|---|---|
| • Unexplained bruises and welts on the face, throat, arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument<br>• Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks<br>• Scald marks: immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks, which may suggest hot water has been thrown over a child<br>• Human bite marks<br>• Broken bones | • Behavioural extremes (withdrawal, aggression or depression)<br>• Unbelievable or inconsistent explanations of injuries<br>• Fear of parents being contacted<br>• Flinching when approached or touched<br>• Truancy or running away from home |

### Emotional abuse

| Physical signs | Behavioural signs |
|---|---|
| • Eating disorders, including obesity or anorexia<br>• Speech disorders (stammering)<br>• Nervous disorders (rashes, hives, facial tics, stomach aches) | • Fear of parent being approached<br>• Fear of making mistakes<br>• Developmental delay in terms of emotional progress<br>• Cruel behaviour towards children, adults or animals<br>• Self-harm<br>• Behavioural extremes, such as overly compliant/demanding, withdrawn/aggressive, listless/excitable |

### Sexual abuse

| Physical signs | Behavioural signs |
|---|---|
| • Torn, stained or bloody underclothes<br>• Pain or itching in genital area<br>• Bruises or bleeding near genital area or anus<br>• Sexually transmitted infections<br>• Pregnancy<br>• Discomfort when walking or sitting down | • Self-harm<br>• Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level<br>• Sudden or unexplained changes in behaviour<br>• Avoidance of undressing or wearing extra layers of clothing<br>• Truancy<br>• Regressive behaviours (bed-wetting or fear of dark) |

Neglect

| Physical signs | Behavioural signs |
|---|---|
| • Height and weight significantly below age level•<br>• Poor hygiene (lice, body odour etc)<br>• Inappropriate clothing for weather conditions<br>• Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites)<br>• Constant hunger, sometimes stealing food from others | • Erratic attendance at School<br>• Chronic hunger or tiredness<br>• Having few friends<br>• Assuming adult responsibilities |

Child Sexual Exploitation

| Physical signs | Behavioural signs |
|---|---|
| • Tiredness or mood swings<br>• Bruising<br>• Sexually transmitted diseases<br>• Pregnancy | • Sudden decline in School performance, punctuality, attendance<br>• In possession of expensive goods<br>• Going to place they cannot afford<br>• Age-inappropriate clothing<br>• Inappropriate sexualised behaviour<br>• Secretive<br>• Deterioration in mental well-being<br>• Mixing with older people<br>• Misuse of drugs and alcohol |

Child criminal exploitation and county lines

| Physical signs | Behavioural signs |
|---|---|
| • See sections on physical and sexual abuse<br>• Carrying weapons<br>• Have been the victim or perpetrator of serious violence (eg knife crime)<br>• Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection<br>• Found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters<br>• Have their bank accounts used to facilitate drug dealing | • Self-harming<br>• Persistently going missing from School or home and/or being found out of area<br>• Deterioration in mental well-being<br>• Unexplained acquisition of money, clothes or mobile phones<br>• Excessive receipt of texts/phone calls and/or having multiple handsets<br>• Relationships with controlling older individuals or groups<br>• Significant decline in School performance<br>• Gang association or isolation from peers or social networks<br>• Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs |

Female genital mutilation (FGM)

| Physical signs | Behavioural signs |
|---|---|
| • Difficulty walking, sitting or standing<br>• Bladder or menstrual problems<br>• Severe pain and bleeding<br>• Infections such as tetanus, HIV and hepatitis B and C | • Abroad for a prolonged period<br>• Unusual behaviour after a period of absence<br>• May talk of a 'special procedure' or 'special occasion to become a woman'<br>• Spending longer periods in the bathroom<br>• Reluctance to undergo normal medical examinations |

Forced Marriage

| Physical signs | Behavioural signs |
|---|---|
| • Cut or shaved hair as a form of punishment for being disobedient | • Absence from School<br>• Failure to return from visit to country of origin<br>• Self-harm or attempted suicide<br>• Running away from home<br>• Early marriage of siblings<br>• Sudden announcement of engagement to a stranger<br>• May talk of a 'special procedure' or 'special occasion to become a woman'<br>• Spending longer periods in the bathroom<br>• Reluctance to undergo normal medical examinations |

Grooming

| Physical signs | Behavioural signs |
|---|---|
| • See section on sexual abuse | • Spending increasingly prolonged time online<br>• Having older boyfriends or girlfriends<br>• Secretiveness about who they are talking to online and what sites they visit<br>• Possession of electronic devices such as mobile phones or webcams that parents have not provided<br>• Engaging less with their usual friends<br>• Using sexual language that you would not expect them to know<br>• Going to unusual places to meet people<br>• Using drugs and/or alcohol<br>• Going missing from home or School |

Radicalisation

| Physical signs | Behavioural signs |
|---|---|
| • out of character changes in dress, behaviour, and peer relationships | • Showing sympathy for extremist causes<br>• Glorifying violence<br>• Evidence of possessing illegal or extremist literature<br>• A sudden disrespectful attitude towards others<br>• Increased secretiveness, especially in relation to internet use<br>• Unwillingness or inability to discuss their views<br>• Increasingly judgemental or argumentative<br>• Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League |

Domestic Abuse

| Physical signs | Behavioural signs |
|---|---|
| • Eating disorders<br>• Self-harm<br>• Unexplained bruises or marks<br>• Complaints of physical symptoms such as tummy aches | • Wary of adults<br>• Aggression, acting out witnessed events<br>• Difficulty concentrating<br>• Difficulty developing relationships<br>• Reduction in attendance and/or attainment<br>• Low self-esteem, depression or anxiety<br>• Substance misuse<br>• Inappropriate relationships |

At Prior Park College we encourage staff to report any change in behaviour or concern they may have about a child, whether it fits into one of the above categories or not. Staff need to have the mind set of 'it could happen here' and to 'think the unthinkable'. If staff are unsure what to do, please speak to the DSL or a deputy.

**External Support**

**Abuse**

Supporting practice in tackling child sexual abuse - CSA Centre Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

What to do if you're worried a child is being abused – DfE advice Domestic abuse: Various Information/Guidance - Home Office (HO) Faith based abuse: National Action Plan - DfE advice Disrespect NoBody campaign - GOV.UK - Home Office website Tackling Child Sexual Abuse Strategy – Home Office policy paper Together we can stop child sexual abuse – HM Government campaign

**Bullying**

Preventing bullying including cyberbullying - DfE advice

**Children missing from education, home or care**

Children missing education - DfE statutory guidance Child missing from home or care - DfE statutory guidance
Children and adults missing strategy - Home Office strategy

**Children with family members in prison**

National Information Centre on Children of Offenders - Barnardo's in partnership with HM Prison and Probation Service

**Child Exploitation**

Trafficking: safeguarding children - DfE and Home Office guidance
Care of unaccompanied and trafficked children – DfE statutory guidance Modern slavery: how to identify and support victims – HO statutory guidance Child exploitation disruption toolkit - HO statutory guidance
County Lines Toolkit For Professionals - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

**Confidentiality**

Gillick competency Fraser guidelines - Guidelines to help with balancing children's rights along with safeguarding responsibilities.

**Drugs**

Drug strategy 2021 - Home Office strategy
Information and advice on drugs - Talk to Frank website
Drug and Alcohol education — teacher guidance & evidence review – PSHE Association

**(so called) "Honour Based Abuse" including FGM and forced marriage**

Female genital mutilation: information and resources- Home Office guidance
Female genital mutilation: multi agency statutory guidance - DfE, Department for Health, and Home Office
Forced marriage - Forced Marriage Unit (FMU) resources. (S

Forced marriage - Government multi-agency practice guidelines and multi-agency statutory guidance
FGM resource pack – HM Government guidance

**Health and Well-being**

Rise Above: Free PSHE resources on health, wellbeing and resilience - Public Health England
Supporting student at schools with medical conditions - DfE statutory guidance Mental health and behaviour in schools - DfE advice
Overview - Fabricated or induced illness - NHS advice

**Homelessness**

Homelessness code of guidance for local authorities – Department for Levelling Up, Housing and Communities guidance

**Information Sharing**

Government information sharing advice - Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.
Information Commissioner's Office: Data sharing information hub - Information to help schools and colleges comply with UK data protection legislation including UK GDPR.

**Online safety-advice**

Childnet provide guidance for schools on cyberbullying
Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation
London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
NSPCC E-safety for schools provides advice, templates, and tools on all aspects of a school or college's online safety arrangements
Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones
South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
Online Safety Audit Tool from UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring

Online safety guidance if you own or manage an online platform DCMS advice A business guide for protecting children on your online platform DCMS advice
UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online

**Online safety- Remote education, virtual lessons and live streaming**

Case studies for schools to learn from each other
Guidance Get help with remote education resources and support for teachers and school leaders on educating students and students
Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely
London Grid for Learning guidance, including platform specific advice
National cyber security centre guidance on choosing, configuring and deploying video conferencing
UK Safer Internet Centre guidance on safe remote learning

**Online Safety- Support for children**

Childline for free and confidential advice
UK Safer Internet Centre to report and remove harmful online content CEOP for advice on making a report about online abuse

**Online safety- Parental support**

Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support
Commonsensemedia provide independent reviews, age ratings, & other information about all types of media for children and their parents
Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
Internet Matters provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world
How Can I Help My Child? Marie Collins Foundation – Sexual Abuse Online
Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation
London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
Stopitnow resource from The Lucy Faithfull Foundation can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online
Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
Parentzone provides help for parents and carers on how to keep their children safe online
Talking to your child about online sexual harassment: A guide for parents – This is the Children's Commissioner's parent guide on talking to your children about online sexual harassment
#Ask the awkward – Child Exploitation and Online Protection Centre guidance to parents to talk to their children about online relationships

**Private fostering**

Private fostering: local authorities - DfE statutory guidance

**Radicalisation**

Prevent duty guidance- Home Office guidance
Prevent duty: additional advice for schools and childcare providers - DfE advice
Educate Against Hate website - DfE and Home Office advice
Prevent for FE and Training - Education and Training Foundation (ETF)
Extremism and Radicalisation Safeguarding Resources – Resources by London Grid for Learning

**Serious Violence**

Serious violence strategy - Home Office Strategy
Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office
Youth Endowment Fund – Home Office
Gangs and youth violence: for schools and colleges - Home Office advice Tackling violence against women and girls strategy- Home Office strategy
Violence against women and girls: national statement of expectations for victims - Home Office guidance

**Sexual violence and sexual harassment Specialist Organisations**

Barnardo's - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.
Lucy Faithful Foundation - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.
Marie Collins Foundation – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.
NSPCC - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.
Rape Crisis - National charity and the umbrella body for their network of independent member Rape Crisis Centres.
UK Safer Internet Centre - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

**Harmful sexual behaviour**

Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details of local specialist sexual violence organisations.
NICE guidance contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.
HSB toolkit The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.
NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework- free and independent advice about HSB.
Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self- assessment toolkit and guidance for addressing HSB in schools.
Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

**Support for Victims**

Anti-Bullying Alliance - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.
Rape Crisis - Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.
The Survivors Trust- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.
Victim Support - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.
Childline provides free and confidential advice for children and young people.

**Toolkits**

ask AVA - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.
NSPCC - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.
NSPCC - Resources which help adults respond to children disclosing abuse.
NSPCC also provides free and independent advice about HSB: NSPCC - Harmful sexual behaviour framework
Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire - Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.
Contextual Safeguarding Network – self-assessment toolkit for schools to assess their own response to HSB.
Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities.
Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
NSPCC - Harmful sexual behaviour framework An evidence-informed framework for children and young people displaying HSB.
Contextual Safeguarding Network – Beyond Referrals - Schools levers for addressing HSB in schools.

**Sharing nudes and semi-nudes**

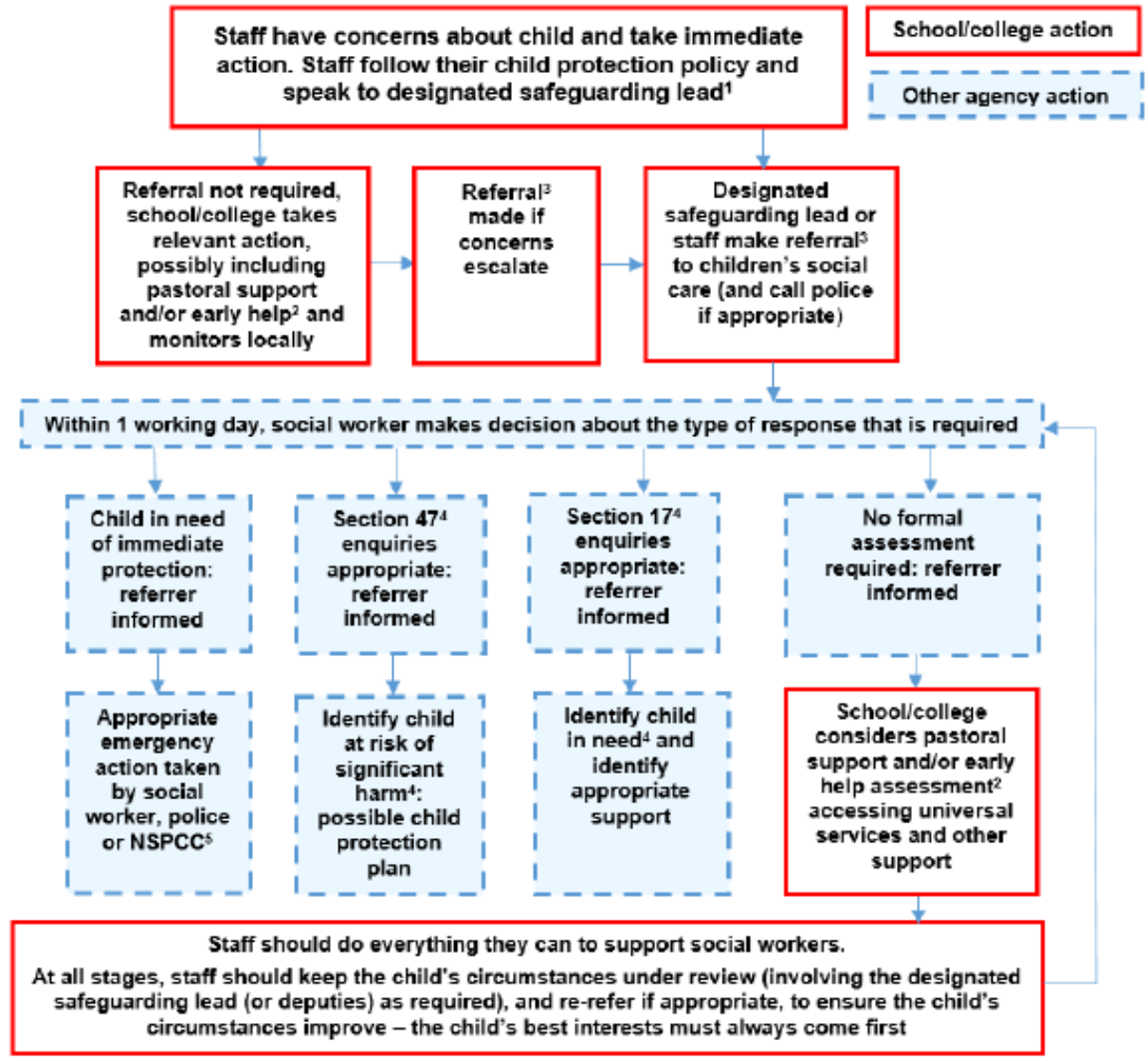
London Grid for Learning-collection of advice - Various information and resources dealing with the sharing of nudes and semi-nudes.
UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people - Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

**Support for parents/carers**

NCA CEOP Thinkuknow: Advice/resources on how to deal with concerns about what children may be doing online including advice on how to help challenge harmful sexual attitudes and start a conversation to support positive sexual behaviour.

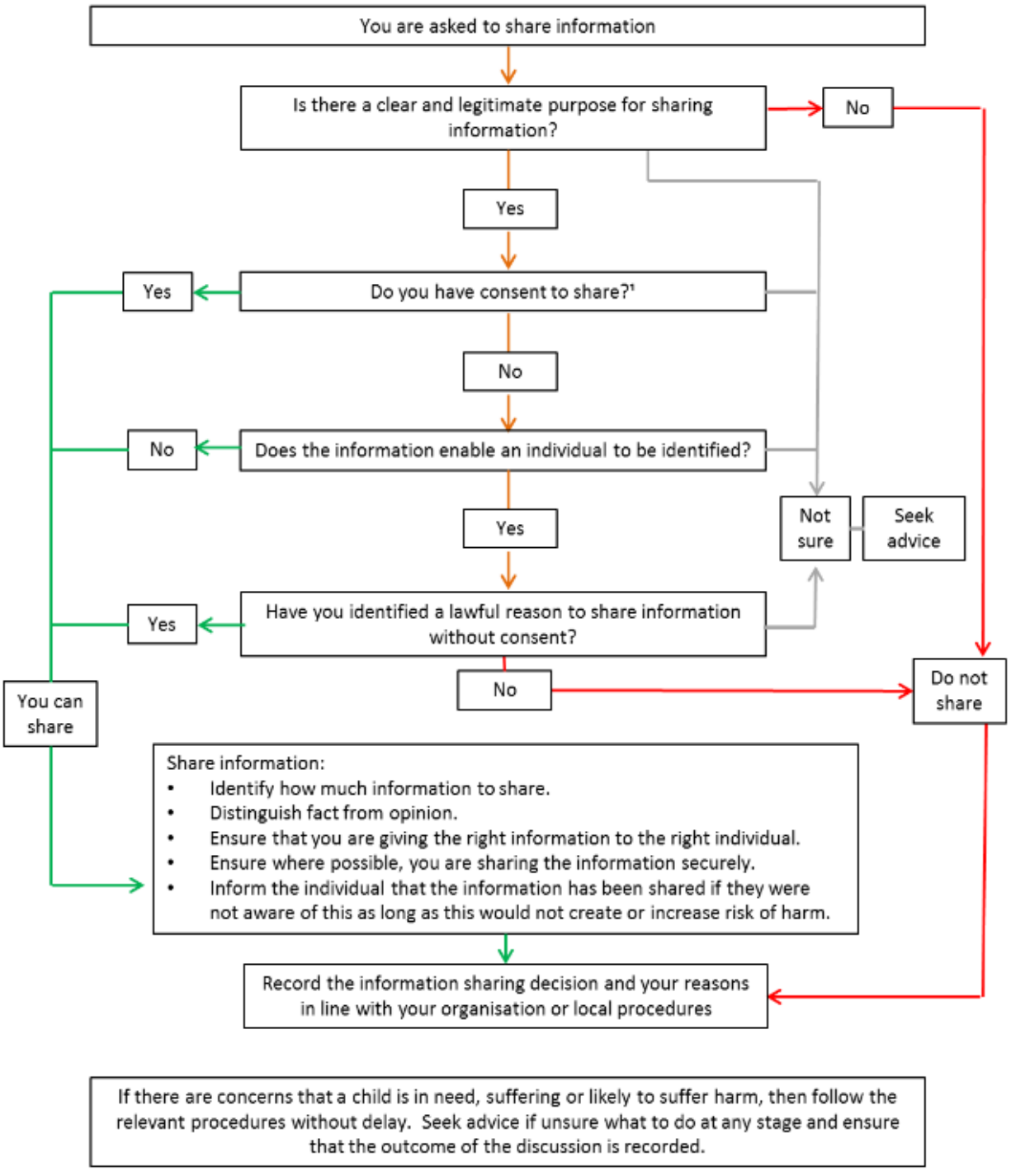
**Appendix 3: KCSIE 2025**

## Actions where there are concerns about a child




[1] In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
[2] Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
[4] Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
[5] This could include applying for an Emergency Protection Order (EPO).

## Appendix 4: Flowchart of when and how to share information



**Appendix 5: DSL Job Description**

# Post: Designated Safeguarding Lead (DSL) & Deputy Designated Safeguarding Lead (DDSL)

## Reporting to:

1. Headmaster
2. Nominated Safeguarding Trustee

## Prior Park Schools

Prior Park Schools (PPS) is a charitable trust comprising 3 independent but interdependent day and boarding schools set in the beautiful Southwest of England and Gibraltar. Prior Park College (PPC), the senior school and The Paragon School (TP), the junior school, both in Bath and a senior school in Gibraltar (PPSG). The heart of Prior Park Schools is the encouraging Christian ethos which nurtures over 1,000 students aged between 3 and 18 years to become confident, capable, compassionate, and independently minded young people.

Each School has a Head and a Senior Leadership Team who lead the day-to-day educational business of their respective schools. The Board of Trustees provides governance and support for the Head and their schools via a number of Governance Committees which include Local Governance Committees for each of the schools, the Finance, Audit, Investment & Risk Committee (FAIR), an Education Committee, Health & Safety Committee and Safeguarding Committee.

The Executive management of the schools is devolved to a Board called the Prior Executive Board (PEB) which comprises the Heads of each constituent school, and the Director of Operations & Finance. The PEB drives the strategic development of PPS, ensuring that it is on track to deliver its Vision and thereby remains a market leader in independent education. The PEB is chaired by the Headmaster of PPC with the agenda and papers provided by the Director of Operations & Finance.

## Purpose of the Role

To take lead responsibility for safeguarding and child protection (including online safety) across the school.

There will be a lead person for each of the following areas:

Online (E-Safety)
Mental Health and Wellbeing
Prevent
Looked after Children
Boarding (where applicable)
EYFS (where applicable)

## The Role

The DSL's responsibility is to maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies, manage referrals, support staff in carrying out their safeguarding duties, to monitor the effectiveness of policies and procedures in practice and to ensure that child protection files are kept up to date.

The DSL will support the DDSLs and ensure they are trained to the same level as a DSL.

**Manage Referrals**

Refer all cases of suspected abuse to:

a) the local authority's Children's Social Services or to the BCSSP/The Care Agency/Royal Gibraltar Police by following the Prevent referral process.

b) the Disclosure and Barring Service (DBS), any person (whether employed, contracted, a volunteer or student) who has harmed, or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier.

c) the Police (where a crime is evident, and where serious harm or risk of harm to a child is suspected, the Police will be informed immediately).

**Work with others**

a) act as a source of support, advice and expertise for all staff

b) act as a point of contact with the safeguarding partners

c) liaise with the Headmaster to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations

d) as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member

e) liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically

f) liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health

g) promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

h) work with the Headmaster and relevant strategic leads, taking 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 children's attendance, engagement and achievement. This includes:

- ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort

and,

- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

**Raise Awareness**

a) ensure each member of staff has access to, and understands, the school's Safeguarding Policy and child protection procedures, especially new and part-time staff

b) ensure the school's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Head of Compliance to ensure Board of trustee approval

c) ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this

d) help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

e) link with the BCSSP/The Care Agency to make sure staff are aware of training opportunities and local policies and procedures.

f) ensure student files are sought from and supplied to other schools in an appropriate manner.

g) ensure National Minimum Standards for boarding are known and followed where relevant, at PPC.

h) ensure Early Years Foundation Stage (EYFS) Framework in known and followed where relevant, at TPS.

i) ensure all staff, Trustees and volunteers have annual face to face training

j) ensure all staff, Trustees and volunteers complete the agreed National College online training module including (but not limited to) Safeguarding, Prevent, Online Safety training modules

k) ensure all staff, Trustees and volunteers read and understand the latest government guidance (for example KCSIE), as appropriate to their role

l) ensure all new staff, Trustees and volunteers are provide with the following during induction training:

- the school's Safeguarding Policy, including the policy and procedures to deal with peer-on-peer abuse and information about the identity and role of the DSL and any deputies
- the Staff Code of Conduct
- the Raising a Concern at Work 'whistleblowing' Policy
- E-Safety Policy
- Student Behaviour Policy
- Anti-Bullying Policy
- the school's procedure for children who are absent from education for prolonged periods and/or repeated occasions.
- a copy of Part 1 of *KCSIE* or Annex A if appropriate
- ensure all staff have annual training on the filtering and monitoring systems and their role within the system

**Information sharing and managing the child protection file**

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, in accordance with the Data Protection Policy.

Where children leave the school or college (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred

separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

**Reporting**

a) The DSL and DDSL's will meet at least half termly to discuss specific safeguarding concerns/cases, as well as focused discussions on specific safeguarding guidance e.g. online safety, peer-on-peer abuse and minutes/a report will be available
b) The DSL will meet at least termly with the Nominated Safeguarding Trustee and a report will be available
c) The DSL will meet annually to complete a Safeguarding Audit with the Nominated Safeguarding Trustee and a report will be available
d) The DSL will meet with the Nominated Safeguarding Trustee, DSLs from the Trust's other schools, Head of Compliance and Head of HR for a Termly Safeguarding Committee meeting and a report will be made available for BOT.

## DSL Training

The DSL (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The DSL should undertake Prevent awareness training. Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

a) understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
b) have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
c) understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children
d) understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
e) are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
f) understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
g) understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalization
h) are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
i) can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
j) obtain access to resources and attend any relevant or refresher training courses

k) encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

l) takes responsibility for understanding the filtering and monitoring systems and processes in place as part of their role

## Hours of work

During Term time the DSL is always available. During the school holidays an on-call rota, which includes the Headmaster, DSL and DDSLs, is disseminated to staff.

## Child Protection

Prior Park Schools is committed to safeguarding and promoting the welfare of children. Applicants must be willing to undergo child protection screening appropriate to the post, including checks with past employers and the Disclosure and Barring Service.

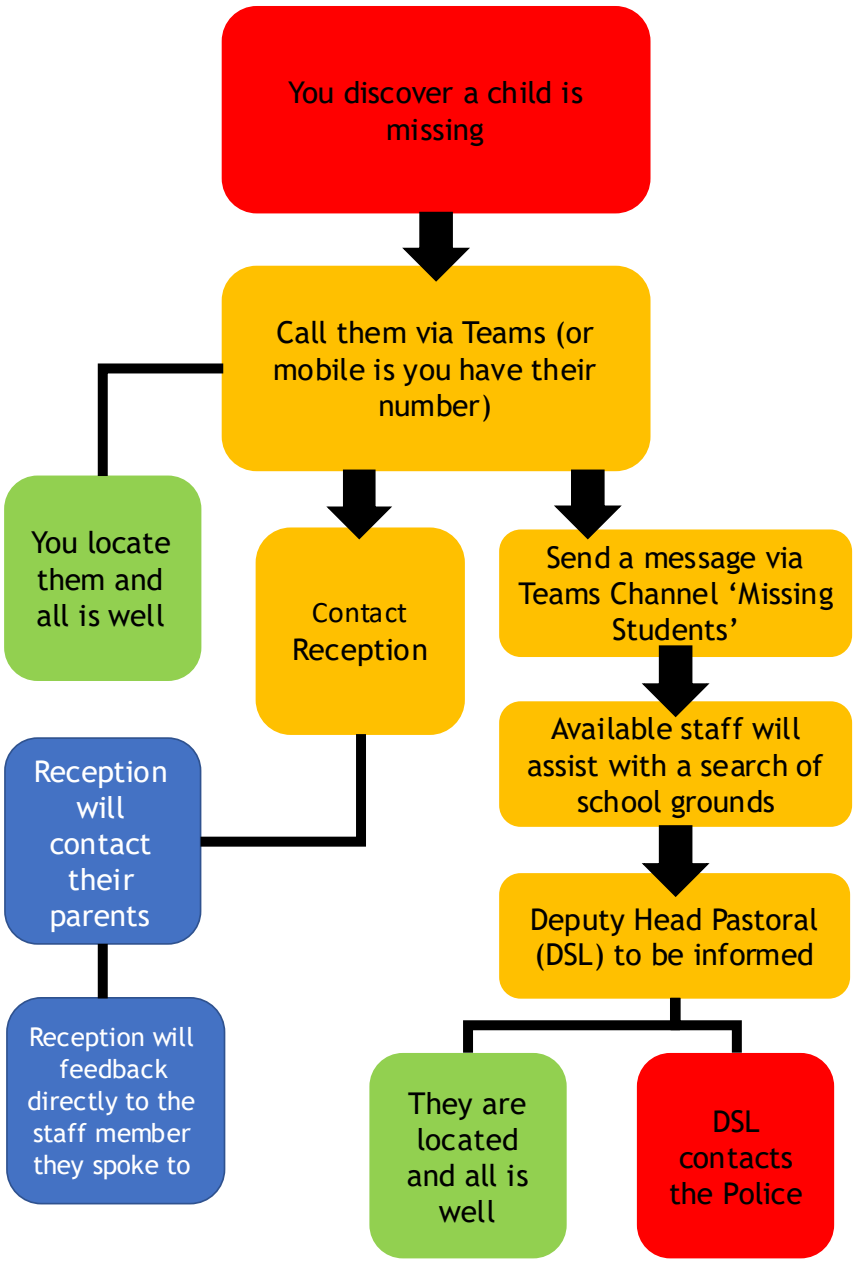
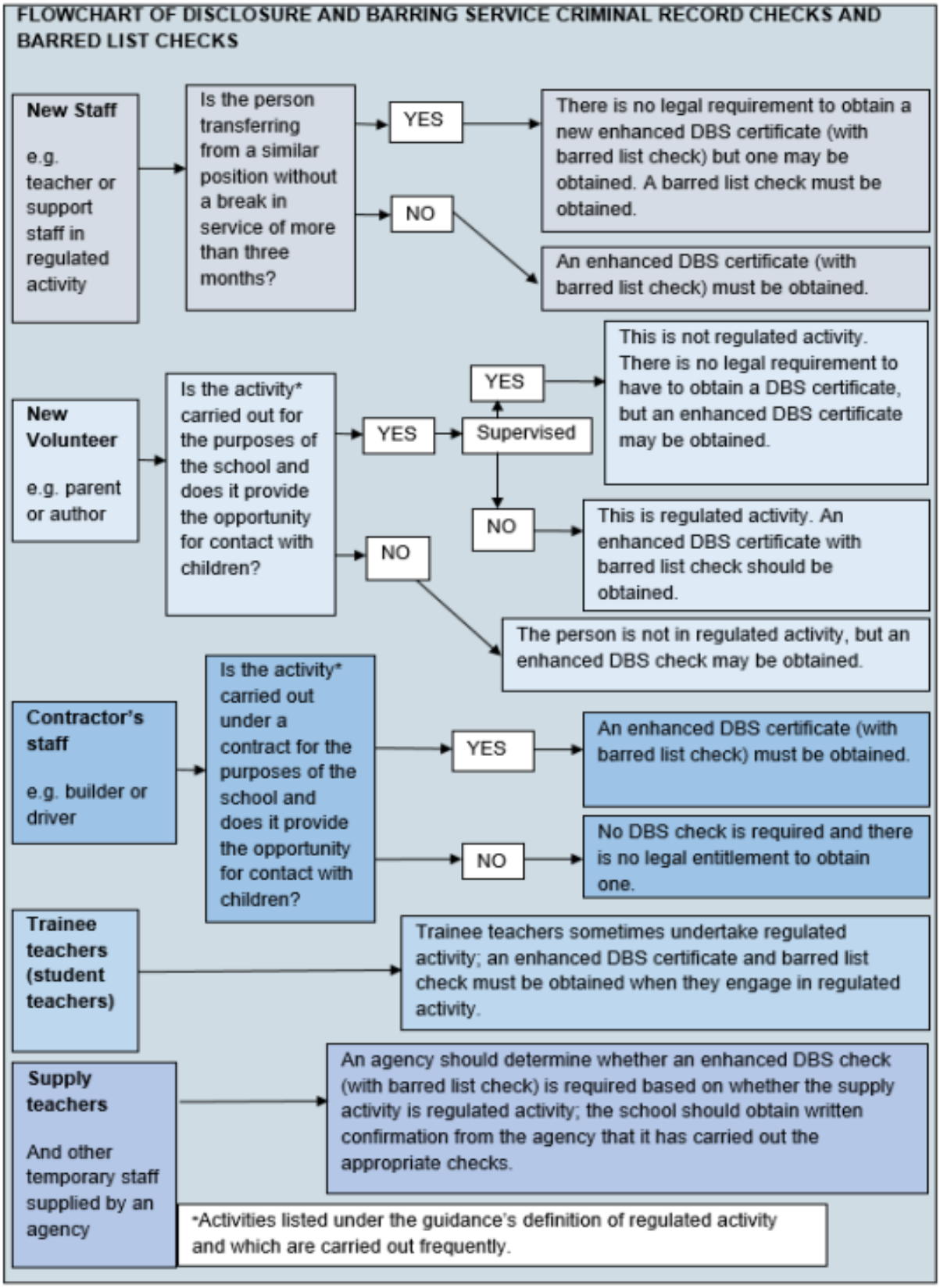
## Data Protection

In the course of employment at Prior Park Schools, staff may have access to confidential information relating to students and their families and are required to exercise due consideration in the way they use such information. Staff should not act in any way which might be prejudicial to the school's interest. Information which may be included in the category covers both the general business of the school and information regarding specific individuals. A strict code of confidentiality must be adhered to at all times. The school is registered under the Data Protection Act 2018 and operates under policies that meet General Data Protection Regulations (GDPR). Staff must not at any time use the personal data held by the school or disclose such data to a third person.

**Appendix 6: What to do if a child goes missing**

Prior Park College

**RESPONSE TO AN INCIDENT OF A MISSING CHILD**



**Appendix 7: From KCSIE 2025**