SAFEGUARDING AND CHILD PROTECTION POLICY

Prior Park Gibraltar

Policy Owner	Applies to	Superseded documents
DSL/Assistant Head Welfare	Prior Park Gibraltar	Safeguarding and Child Protection Policy v4
Associated documents	**Review frequency**	**Legal Framework**
All PPG specific and PPS Associated Safeguarding Policies	Every year (unless the legislation/regulations update before this time) **Implementation date** 14 September 2026	See Section Two

Prior Park Gibraltar

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.

Last reviewed by:	Assistant Head, Welfare and DSL (Miss M Porro), Head (Mr P Martyn) and Head of Compliance (Miss E Wickham)
Date last reviewed:	August 2026
Approved by Trustees:	Approved by Head, Nominated Safeguarding Trustees, Chair of Trustees and Board of Trustees
Approved by Trustees:	9 September 2026
Date for next approval:	September 2027

**This Policy has been approved by the Nominated Safeguarding Trustees and the Chair of Trustees; it will be ratified by the BOT on 9 September 2026.*

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and Prior Park Paragon (PPP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park Gibraltar (PPG), 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

Policy Approved by: Safeguarding Trustees Mr Nic Dowler and Mr Paul Lyon	**Date: 1 September 2026**
Designated Safeguarding Lead: Miss Maxine Porro	**Date: 1 September 2026**
Chair of Trustees: Mr David Catlow	**Date: 1 September 2026**

Prior Park Gibraltar

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Prior Park Gibraltar

1. Safeguarding Contact Details

Prior Park Gibraltar

Position	Name	Contact details
Head	Mr Paul Martyn	pmartyn@priorparkschools.com
Designated Safeguarding Lead (DSL)	Miss Maxine Porro	mporro@priorparkschools.com
Deputy Designated Safeguarding Lead (DDSL)	Mr Jamie Comber Mrs Danni Rozario	Jcomber@priorparkschools.com drozario@priorparkschools.com
E-Safety Lead	Mrs Danni Rozario	drozario@priorparkschools.com
Nominated Safeguarding Trustee	Mr Paul Lyon Mr Nic Dowler	plyon@priorparkschools.com ndowler@priorparkschools.com
Chair of Trustees	Mr David Catlow	dcatlow@priorparkschools.com

Gibraltar Safeguarding

Role	Contact Details
The Care Agency	200 78528 Enquiries: 200 67653 infocareagency@gibraltar.gov.gi
The Care Agency Referrals	Referral.concernsforachild@careagency.gov.gi
Royal Gibraltar Police	200 72500 safeguarding.rgp@royalgib.police.gi cpru@royalgib.police.gi, www.police.gi https://report.iwf.org.uk/gi https://www.police.gi/report/possible-terrorist-activity
Gibraltar Designated Officer	GDO@careagency.gov.gi
Duty Social Worker (out of hours)	200 72500
GHA	200 79700 info@gha.gi www.gha.gi
Ministry for Health, Care and Justice	200 07386 ministry@gha.gi www.gha.gi/about-us/ministry-for-health
Social Services	All Enquiries: 200 78528 Head of Adult Services: 200 50813 Head of Children's Services: 200 75729 Children's Services: 200 50816 Children's Residential Services Manager: 200 67036

Other useful contact details

Organisation	Phone
Childline	58008288
NSPCC	0808 800 5000
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
National Domestic Abuse Helpline	0800 2000 247
GibSams	116 123

2. Introduction

2.1 Prior Park Gibraltar 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 Gibraltar recognises that children and young people learn best when they are healthy, safe and secure.

2.2 Safeguarding and promoting the welfare of children is defined for the purposes of this guidance (as defined in Working together to safeguard children 2026) as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

2.3 This policy applies to all children at Prior Park Gibraltar. For the purpose of this policy, a child or children refers to everyone under the age of 18.

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 Gibraltar'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.

2.5 This policy is published on Prior Park Gibraltar'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 the following legislation and guidance:

- Keeping Children Safe in Education (DFE Sept 2026)
- 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 (2026)
- Revised Prevent Duty Guidance for England & Wales (December 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 (Sept 2026)
- Online Safety Act 2023
- Crime and Policing Act 2026
- NSPCC; When to call the Police
- The Children Act 1989, The Children Act 2004
- Education Act 2002, Section 175 and Section 157

- Independent School Standards Regulations November 2014
- COBIS Compliance and Accreditation Framework 2024

International Context

COBIS (Council of British International Schools) recommend that schools operating in different countries will need to produce or implement policies, or take action, in order to comply with local regulations. While Safeguarding and Child Protection policies may vary from school to school and country to country, the expectation from COBIS is that the standard of policies and procedures implemented by schools should be of a quality at least as high as those required in the UK and follow international and UK best practice.

PPG always works in conjunction with the Trust's other two UK schools when writing and implementing safeguarding related policies.

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 Gibraltar which supports 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**
  - All School Staff, including staff who do not work directly with children, read, at least, **PART ONE OF KCSIE**
  - Volunteers read **PART ONE 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 Gibraltar expects all staff, Trustees and volunteers to share our commitment to safeguarding and promoting the welfare of all children in our care. 'Children' includes everyone under the age of 18. 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 Gibraltar 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.

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 Care Agency and contribute to inter-agency working
- support children in need through early intervention and, where appropriate, support them in co-operation with multi-agencies
- 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
- 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
- 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
- Staff should also be aware that harm can take place either within or outside the home, including online, and should support all children with any concerns of abuse or harm in this instance

4. Roles and responsibilities

4.1 Safeguarding and child protection is everyone's responsibility. All staff should be aware of the indicators of abuse, neglect and exploitation, understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

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
- To provide help and support to meet the needs of children as soon as problems emerge
- All staff should be prepared to identify children who may benefit from early help.
- Be aware, and report or act upon, children who are absent from education on repeat occasions/or for prolonged periods
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL
- to compete additional training from the National College 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
- Ensure any concern is logged on the School's CPOMS system in a timely manner and with as much factual information as possible
- support other agencies following any referral.

Prior Park Gibraltar plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of PSHCE, which is inclusive and delivered regularly, tackling issues such as:
    - Supporting children to develop the skills that form the building blocks of all positive relationships
    - Healthy and respectful relationships
    - Boundaries, consent and kindness in relationships
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship, including coercive and controlling behaviour
    - The concepts of, and laws relating to all forms of sexual harassment and abuse, and how to access support
    - What constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it
    - Understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help

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 online 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, jointly complete an annual safeguarding audit, and prepare appropriate board reports on a termly basis and an annual report to the full Board.

The School also has two 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 2026) to include:

- in collaboration with the Head, liaise with and manage referrals to relevant agencies such as The Care Agency, the Police, the Gibraltar Designated Officer (GDO), the Disclosure and Barring Service (DBS), ACRO (Criminal Records Office), and the Teaching Regulation Agency (TRA)
- keep the Head and the Local Gibraltar Board informed of ongoing safeguarding and child protection issues and enquiries where applicable
- 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 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 including Prevent awareness and Exploitation training, emerging issues and local early help, safeguarding and child protection procedures and working practices
- provide regular updates to all staff members and Trustees on any changes in safeguarding or child protection legislation
- 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
- oversee LAC/Post LAC (Looked after Children) 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
- liaise with the four 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.

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, Miss Maxine Porro 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 **Head**

The Head is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Head 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 2026
- 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 Care Agency; and
- notifies the GDO, 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 KCSIE
- 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 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.

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 Gibraltar and across the Trust.

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

- Safeguarding meetings between the Nominated Safeguarding Trustee, DSL and Head of Compliance at least once a term and more regularly, if needed
- Full Safeguarding meeting between the Nominated Safeguarding Trustee, all three PPS DSLs, Head of HR and Head of Compliance at least once a term and more regularly, if needed
- Annual Safeguarding Committee meeting
- liaising with the local authority and/or partner agencies where appropriate
- termly Local Governance Committee reports
- 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 **HM Government of Gibraltar: The Child Protection Team**

- The Child Protection Team

The Care Agency works to promote the welfare of children generally and in particular those considered being in need. As far as possible, it enables children to be raised up by their families by providing a range of support

services. The Child Protection Team deals with all incoming referrals concerning children; they undertake assessments. Children and families that need help may be offered advice, counselling, and guidance on parenting, amongst other services.

Where the Care Agency has reasonable cause to suspect that a child in its jurisdiction is suffering or is likely to suffer significant harm it has a duty to make enquiries.

The purpose of such an enquiry is to decide what action, if any, is necessary to safeguard the child's welfare. An Initial Assessment and/or Core Assessment will be conducted, which involves inter-agency enquiries regarding the child's education, health, general welfare and any particular matter which may have acted as a catalyst for the child coming to the attention of the Care Agency in the first place. If necessary, a Child Protection Conference can be convened to coordinate multidisciplinary responses to any perceived needs that the child may have, and a decision is made as to whether or not the child should become subject to a multi-agency Child Protection Plan.

Most children with a Child Protection Plan remain at home with monitoring and support. However, in some cases, after conducting in-depth assessments, it may be considered unsafe for the child to remain at home. The Child Protection Team will then accommodate the child and bring his/her circumstances to the attention of the Court in a process that is known as Care Proceedings.

Work with the then looked after child continues, looking at key issues that affect him/her. Work with the family also continues, in an attempt to improve conditions for the child's safe return home.

In some cases, where the necessary changes do not occur, longer-term plans will be made for the child. In most cases, the Care Agency will encourage contact between Looked after Children and their families if this is consistent with their welfare.

4.8 **Working with Parents and Carers**

Prior Park Gibraltar 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 Gibraltar 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 2026 and Keeping Children Safe in Education 2026.

The school recognises its vital role in safeguarding school-age children and will co-operate with the Care Agency and GDO to ensure joint working with partner agencies in order to improve outcomes for children in Gibraltar. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow the 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 Gibraltar 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.

4.10 **Human Rights**

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled 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,
- 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 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 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 **Miss Maxine Porro (Assistant Head Welfare)** and a member of the Senior Leadership Team.

If the DSL is unavailable, the role will be carried out by the Deputy DSL:

- Mrs Danni Rozario
- Mr Jamie Comber

The DSL or Deputy DSL is 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 DSL are unavailable, the role will be carried out by the Head. Outside School hours and during out-of-term activities, a designated member of the DDSL Team will assume temporary responsibility.

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

6. Staff training

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

6.2 Induction training for all new members of staff, Trustees and 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**
  - All School Staff, including staff who do not work directly with children, read, at least, **PART ONE OF KCSIE**
  - Volunteers read **PART ONE OF 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 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.

6.3 All staff, including Trustees and volunteers involved in regulated activity, will undertake appropriate child-protection training which, in line with KCSIE, 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.

6.4 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 is 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.

6.5 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.

6.6 The DSL and Deputy DSLs undertake training 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 the COBIS International DSL Training every year, as well as safeguarding specific National College Courses. The DSL and DDSL also attend ad hoc training sessions throughout the year covering specific safeguarding areas.

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 COBIS
- 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 children from the risk of radicalisation
- be able to keep proper written records of concerns and referrals.

6.7 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.

7. Intervention

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

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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
- taking action to enable all children to have the best outcomes
- 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.

7.1 Prior Park Gibraltar will refer to KCSIE thresholds 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.

7.2 All referrals for a children's social care service will be made here: infocareagency@gibraltar.gov.gi

7.3 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

7.4 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.

8. Early Help

8.1 Prior Park Gibraltar recognises the importance of providing early help to support children of all ages to improve a family's resilience and outcomes or reduce the chance of a problem getting worse. 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.

8.2 If staff believe that a child could benefit from early help, they should discuss the matter with the DSL who will consider what action should be taken.

8.3 Prior Park Gibraltar 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.

8.4 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
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Student Referral Unit
- 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.

8.5 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.

8.6 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.

8.7 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.

8.8 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.

8.9 Reference should also be made to Working Together to Safeguard Children and the Neglect Toolkit, Neglect Toolkit Checklist and Key Areas of Neglect.

Referral for Statutory Social Work Service

8.10 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 The Care Agency. Staff are also able to make a referral directly to The Care Agency directly if they want to.

9. What to look out for and when to be concerned

9.1 All staff should be aware of the types and signs of abuse, neglect and exploitation 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.

9.2 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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. Children can be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse.

9.3 Staff 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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 penetration with an object) 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.

9.4 Other forms of abuse which staff should be aware of are:

- Children who have unexplained and/or persistent absences from education
- 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.

10. 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.

11. Signs of abuse

11.1 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.

11.2 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

11.3 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.

12. Listening to children and record keeping

12.1 The School provides a range of opportunities for children to be listened to. Children can speak with their Tutors, Head of House, class teachers, our Health and Welfare Coordinator, a member of the Pastoral team or, upon request, 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 displayed 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.

12.2 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 Head
- only share information on a need-to-know basis

- make a full written record of the conversation as set out below.

12.3 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) (updated in March 2024).

Any concerns relating to online images must be reported to https://report.iwf.org.uk/gi

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

13.1 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.

13.2 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.

13.3 Prior Park Gibraltar will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM.

13.4 All concerns regarding FGM must be reported immediately to the DSL. Where the statutory mandatory reporting duty applies, teachers remain personally responsible for making the report to the police and should inform the DSL without delay.

13.5 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.

13.6 Parents can report to the DSL on the welfare of any child in Prior Park Gibraltar, 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.

13.7 Any member of staff may refer a matter to The Care Agency 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.

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

14.1 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 The Care Agency.

14.2 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 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.

14.3 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.

14.4 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 Head. 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.

15. Making a referral to the Care Agency

15.1 When a child is not considered at risk of harm but still has an unmet need that could mean they are a Child in Need, the School will seek to work with local services and families to ensure they are supported.

15.2 Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) The School will coordinate with the local agencies involved and create a care plan between the relevant agencies, the School is committed to ensuring individual agencies communicate regularly.

15.3 Where possible, a decision to refer a student to the Care Agency should be made by the designated safeguarding lead or their deputies 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.

15.4 Referral should be made online https://childrenscareprogram.careagency.gov.gi/referral,

15.5 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.

15.6 Parental consent can 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.

15.7 If the child already has an allocated social worker, the referral should be made directly to them. You do not need to complete another MARF form an email can be sent directly to the allocated social worker copying in their line manager also.

15.8 If the school 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.

15.9 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.

15.10 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 Care Agency within one working day. If this is not received, the DSL should contact children's social services again.

15.11 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.

15.12 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.

15.13 Where relevant, the School will co-operate with the Care Agency 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. 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).

15.14 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 but also seek to support the individual as false allegations may indicate an underlying mental health condition

15a **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 form tutoror Head of House 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.

15b **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 professionals as required.

16. Informing parents

16.1 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 Care Agency, the police and/or the Head before discussing details with parents.

16.2 For Prevent 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.

16.3 At the point of referral to the Care Agency, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of the Care Agency.

17. Allegations about members of staff, supply staff, contractors and volunteers

17.1 **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 statutory information in KCSIE.

- The Head is the school representative for the purposes of the allegation's procedures. 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 Head; allegations against the Head will be referred to the Chair of Trustees (contact details in part 1 of this policy).

17.2 **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 2026).

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.

Organisations or Individuals using school premises

If we receive an allegation relating to an incident that happened when an individual or organisation was using any one of our school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), as with any safeguarding allegation, we will follow our safeguarding and low-level policies and procedures, including informing the Care Agency and/or the Police.

Trustees
If an allegation is made against a Trustee, we will follow our safeguarding and low-level concerns policies and procedures. Where an allegation is substantiated, we will follow the procedures to consider removing them from office.

17.3 **Reporting an allegation about staff**

It is essential that any allegation made against a person who works with children and young people, including those who work in a voluntary capacity, is dealt with fairly, quickly, consistently, in a way that provides effective protection for the child, and at the same time supports the person who is the subject of the allegation.

The school will use the Gibraltar Child Protection Committee- Managing Allegations Framework which follows the UK statutory guidance contained in *Working Together to Safeguard Children 2026*.
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Where an allegation is made about a member of staff, supply staff, contractor or volunteer, the matter should be reported immediately to the Head or DSL, in the Head's absence.

- Allegations about the Head should be reported to the Chair of Trustees (contact details in section 1 of this policy) without notifying the Head.
- Allegations about the DSL should be reported to the Head.
- 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 Head, DSL or Chair of Trustees who receives any such allegation is referred to in these procedures as the 'case manager'.

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

Before contacting the Royal Gibraltar Police (RGP) and/or the Gibraltar Designated Officer (GDO), the case manager will conduct basic enquiries in line with the Managing Allegations Framework 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 investigation.

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

Any allegations meeting the criteria will be dealt with in accordance with the Managing Allegations Framework. All such allegations must be dealt with as a priority to avoid any delay.

Any allegations not meeting the criteria will be dealt with through internal policies and procedures.

The case manager will immediately (and in any event within one working day) discuss the matter with the GDO 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 GDO is consulted. The purpose of the initial discussion between the case manager and the GDO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the GDO 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 GDO, and agreement reached on what information should be put in writing to the individual concerned and by whom.

The case manager will inform the accused person of the allegation as soon as possible after the GDO has been consulted and, if appropriate, children's social care and the police. The Managing Allegations Framework will be shared as part of this process.

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 RGP in line with local procedures for dealing with such allegations. The RGP will then coordinate with children's social care and the police.

The case manager will inform the accused person of the allegation as soon as possible after the GDO 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.

17.6 **Investigation**

Investigations will usually be undertaken by a senior member of School staff, under the guidance of the RGP. 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 RGP may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the RGP should provide specific guidance as to 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 Gibraltar will ensure allegations are dealt with properly. Prior to ceasing to use a supply member of staff due to safeguarding concerns, the facts will be found out and the RGP 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 Gibraltar 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 RGP. 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 UK DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:

- **Substantiated –** there is sufficient identifiable evidence to prove the allegation.
- **Unsubstantiated –** there is insufficient evidence to prove or disprove the allegation. This is not the same as a false allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded –** There is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.
- **Malicious –** There is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.
- **False –** There is sufficient evidence to disprove the allegation.

17.7 **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.

17.8 **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 RGP 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.

17.9 **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 Care Agency, the GDO and RGP, 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 Gibraltar.

17.10 **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 The Care Agency 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 Head 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.

17.11 **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 Governing Body 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.

17.12 **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.

17.13 **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 Gibraltar 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.

18. Low-level concerns

18.1 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 GDO/RGP

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.

18.2 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.

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

Where the concern relates to the Head, 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 Head/DSL/Chair of Trustees when the concern is reported to them.

If there is a conflict of interest in sharing a low-level concern with the DSL and Head, the low-level concern should be shared with the Chair of Trustees via the Chief Operating Officer, unless there is conflict of interest in doing so, in which case it should be reported directly to the GDO.

18.4 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.

18.5 If the DSL/Head 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 the GDO.

18.6 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 Head as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

18.7 All low-level concerns, including those determined to be unfounded, will be recorded in writing by the DSL/Head. 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 Head 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.

18.8 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 RGP and found to be substantiated, it will be referred to.

18.9 Records of low-level concerns will be reviewed at least termly by the DSL, Head, Head of Compliance and Head of HR 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 GDO and, more broadly, whether existing policies need to be revised and/or additional training is required.

18.10 The number of Low-Level Concerns, brief context and actions taken are shared with the Board of Trustees, termly.

19. Arrangements for dealing with child-on-child abuse and allegations

19.1 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);
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- 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);
- serious physical assault and harm, or the threat of harm with a weapon;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual making or sharing of nudes and semi-nudes;
- 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); and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

19.2 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.

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

19.4 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.

19.5 Prior Park Gibraltar 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.

PPG is committed to ensuring that its response to any reports of child-on-child abuse is part of on-going proactive work and a 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.
        - 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.

19.6 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.

19.7 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 gives reasonable cause to suspect a child is suffering or is likely to suffer significant harm, the case will be referred to The Care Agency using the procedures set out in this policy.

The School will take advice from The Care Agency 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 2026).

19.8 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.

19.9 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.

19.10 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
- 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. Child-on-child sexual violence and sexual harassment

20.1 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.

20.2 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

20.3 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 risk 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.

20.4 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.

20.5 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.

20.6 Section 12 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 follow 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.

20.7 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) are significantly older, more mature or more confident)
- whether the victim has a disability or learning difficulty
- 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.

20.8 The DSL will reach a judgement about which of the following four ways is the most appropriate for handling 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.
- The Care Agency: 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 Care Agency and/or the police. The School will follow the guidance as set out in detail in KCSIE (2025), Part 5.

20.9 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.

20.10 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.

21. Other safeguarding arrangements

21.1 **Mental health**

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child

is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- Significant changes in behaviour,
- Ongoing difficulty sleeping.
- Withdrawing from social situations,
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves

21.2 **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 disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- the need for intimate care or that these children are isolated from others
- that these children are more likely to be dependent on adult for care
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content behaviours in schools or colleges or the consequences of doing so

To address these additional challenges, staff at Prior Park Gibraltar 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 years
- Supporting Students at School with Medical Conditions

21.3 **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 content, for example: pornography, racism, misogyny/misandry, self-harm, suicide, anti-Semitism, radicalisation, extremism, 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. The School has an Acceptable Use of IT policy. It 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 systems we have in school to monitor online safety both in school and 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.

Filtering and monitoring
PPG 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:

- Low level filtering – 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.
- Medium level filtering – 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.
- High level security – 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.

The DSL is responsible for monitoring any safeguarding concerns which are flagged by the system and the IT team is 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.

PPG 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
PPG 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

21.4 **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.

21.5 **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 all appointments, either an enhanced DBS check with 'barred list' information or an ICPC will be required. Where this is not feasible, additional police checks will be completed. 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.

21.6 **Children who are absent from education for prolonged periods and/or repeated occasions**

Prior Park Gibraltar understands the need to be aware of those children who are persistently absent or have unexplainable absences from school, as this may be an indicator of welfare concerns.

PPG understands the need to be aware of those children who are persistently absent, have prolonged or unexplainable periods of absence, as this may be an indicator of welfare concerns and could have an impact on their mental health.

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

- Tutors have 1 to 1 conversation with students if their attendance has dropped to 93% attendance.
- Tutors highlight concerns to HoH if students % attendance drops to 90%.
- HoHs engages with parents – invites parents for a meeting with tutor and HoH.
- HoH highlights concerns to DH O&P if student's attendance falls below 87%.
- DH O&P/Ho6F invites parents to a meeting with HoH to discuss concerns and find solutions.
- DH O&P highlight concerns to HT if a student's attendance falls below 84%.
- HT invites parents to a meeting with DH O&P/Ho6F to discuss concerns and find solutions. Depending on the circumstances, this may include formalising support through an **attendance contract** at school.
- HT invites parents & student to a meeting with DH O&P/Ho6F if student's attendance does not improve despite being on an attendance contract.

The school will work with local authority children's services where school absence indicates safeguarding concerns.

21.7 **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.

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

- Risk assessment –the School assesses the risk of children being drawn into terrorism, including extremist ideologies
- Working in partnership –liaising closely with the Care Agency to ensure children requiring support are referred at a suitably early stage
- Staff training –enabling staff to identify children at risk of 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.

21.8 **Visiting speakers**

Prior Park Gibraltar 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 Gibraltar'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 Deputy Head (Pastoral), 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. Where possible the RP will seek to obtain copies of any presentation sides or other materials intended to be used by the visiting speaker so that they can judge its appropriateness.

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 (Welfare) 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 Gibraltar's *Visiting Speaker Policy* for further information.

21.9 **Confidentiality and information sharing**

Prior Park Gibraltar 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/School Gibraltar 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 RGP 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. Guidance can be found at DfE Data Protection guidance for schools.

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 Head 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 Head (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.

21.11 **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.

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

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

Prior Park Gibraltar 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 Gibraltar will use physical intervention and restraint only in line with the school's 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

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.

21.13 **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.

21.14 **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*.

21.15 **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 RGP 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 the 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 Board of Trustees.
- 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 the most current version of KCSIE, alongside any other relevant statutory guidance as reference.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

21.14 **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
- Social Media Policy
- Visiting Speaker Policy
- Registration and Attendance Policy
- Visitors and Contractors Access and Supervision Policy
- Use of Restraint Policy
- Taking, Using and Storing Student Images Policy.

Appendix 1: Other types of abuse

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.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. 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 – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.
- have been the victim, perpetrator or alleged perpetrator of serious violence

Children who have been exploited will need additional support to help keep them in education. Child Sexual Exploitation (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.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

F Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

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 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 going missing from education 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), so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Prior Park Gibraltar will report to the Gibraltar Education 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.

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).

Children with family members in prison: Approximately 193,000 children in England and Wales have a parent in prison each year. They are at risk of poor outcomes as a result of poverty, stigma, isolation and poor mental health. The Prisoners' Families Helpline offers free, confidential support and advice for families in England and Wales who are in contact with the criminal justice system.

School and college staff should be aware that children who have experienced parental imprisonment are more likely to be absent (or excluded) than their peers, to experience mental ill health and drug and alcohol misuse; they are also less likely to be in education, training or employment in later life. Staff should understand the need for tailored, trauma informed and sensitive support that can help mitigate potential harm and help encourage stability.

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.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are 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
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals

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 crime continues to represent one of the most significant and rapidly evolving threats within the United Kingdom's (UK) crime landscape. Offences under the Computer Misuse Act 1990 (CMA) have risen substantially.

Young people across the UK experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with scope to cause disruption to national infrastructure.

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded,
- '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, and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills 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 preventative 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 cyberdependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

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)- for information and support for PPG staff in Gibraltar.

Honour or faith-based abuse (including female genital mutilation and forced marriage): Honour or faith-based abuse (HBA) encompasses incidents or 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. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As 170 appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers157 that requires a different approach (see below). 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.

FGM mandatory reporting duty for teachers: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report 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 under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.158 Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college's designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet. Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section.

Forced marriage: 157 Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England). 158 Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case. 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 can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, 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).

Lesbian, gay, bisexual or gender questioning ("LGBT"): A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Schools and colleges should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

Children who are questioning their gender: In recent years, we have seen a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

Prior Park School recognises that some children may experience uncertainty or questions about their gender identity. Children in this situation may be vulnerable to bullying, social difficulties, anxiety or other emotional and mental health needs.

The welfare, wellbeing and safety of the child will always be our primary consideration. We are committed to providing a supportive environment in which all pupils are treated with dignity, respect and kindness. The School will take a proactive approach to preventing and responding to any form of bullying, harassment or discrimination.

The Designated Safeguarding Lead (DSL) will oversee any safeguarding concerns relating to a pupil who is questioning their gender and will work with the child, their parents/carers and relevant professionals, where appropriate.

Prior Park School recognises the importance of working in partnership with parents and carers.

Where a child seeks support from the School regarding questions about their gender, parents/carers will normally be involved at an early stage. In exceptional circumstances, where involving parents/carers may place a child at risk of significant harm, the DSL will seek appropriate safeguarding advice before determining the most appropriate course of action.

The School will take a careful, individualised and safeguarding-led approach to any request for support relating to gender identity.
In considering any request, the Prior Park School will take account of:

- the child's welfare, wellbeing and safeguarding needs;
- the views of the child and their parents/carers;
- the age, maturity and understanding of the child;
- the rights, safety and wellbeing of other pupils;

- the School's obligations under safeguarding, equality and human rights legislation; and
- relevant statutory guidance.

All decisions will be considered on a case-by-case basis and appropriately recorded.

Prior Park School provides separate toilets and changing facilities for boys and girls in accordance with age, legal requirements and relevant guidance.

Pupils must use the facilities designated for their biological sex. Where a pupil has specific needs, the School will consider what reasonable arrangements may be appropriate to support the child while also safeguarding the privacy, dignity, safety and wellbeing of all pupils.

Any such arrangements will be considered on an individual basis and in consultation with parents/carers where appropriate.

Prior Park School does not provide boarding accommodation. However, where pupils attend residential visits requiring overnight accommodation, arrangements will be made to provide separate sleeping, changing and washing facilities for boys and girls in accordance with legal requirements, safeguarding guidance and risk assessments.

Prior Park School may organise some sports, games and physical education activities for pupils in single-sex groups where this is considered appropriate having regard to safety, fairness, physical development and the nature of the activity.

Decisions regarding participation in sporting activities will be made on a case-by-case basis, taking into account the welfare of the child, fairness, safety and the needs of other participants.

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.

Overseen by the DSL, Heads of Houses act as the designated teacher for LAC and previously looked after children at Prior Park Gibraltar. They 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.

Mental health: Where children 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, attendance and progress at school. More information can be found in the Mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

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).

Whilst Prior Park Gibraltar operates outside of the UK and cannot be an Operation Encompass school, we will still engage with the guidance and support provided by Operation Encompass where possible.

Preventing Radicalisation: Children and young adults may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our safeguarding approach.

"Radicalisation" is the process of a person legitimising support for, or use of, terrorist violence.

"Terrorism" is 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 the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the 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 Gibraltar 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 Royal Gibraltar Police 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 by the Police http://police.gi.gridhosted.co.uk/report/possible-terrorist-activity

The Prevent duty: All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard150 to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel: Gibraltar does not have a specific Channel organisation, unlike the UK. PPG Staff can access support and guidance from the Royal Gibraltar Police, Counter Terrorism department. They provide a wide range of resources and support in protecting against terrorism.
Royal Gibraltar Police - Counter Terrorism and referrals can be made at: Royal Gibraltar Police - Reporting Possible Terrorist Activity

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.

Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL (or a deputy

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.

Detailed advice is available in Part five of Keeping children safe in education 2026

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when students are travelling to and from school. These times can be particularly risky for young people involved in serious violence.
Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found here. As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

Sharing nudes and semi-nudes: The term 'sharing nudes and semi-nudes' refers to the creation, sending or posting of nude or semi-nude images, by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams

The term 'nudes' is used because it is the most widely understood by young people and best captures the full range of image-sharing behaviours covered in KCSIE. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

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 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 The Care Agency 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) and Children's social care: virtual school head role extension - 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.

Prior Park Gibraltar

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 suggest the use of an instrument • Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks • 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 • Human bite marks • Broken bones	• Behavioural extremes (withdrawal, aggression or depression) • Unbelievable or inconsistent explanations of injuries • Fear of parents being contacted • Flinching when approached or touched • Truancy or running away from home

Emotional abuse

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

Sexual abuse

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

Prior Park Gibraltar

Neglect

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

Child Sexual Exploitation

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

Child criminal exploitation and county lines

Physical signs	Behavioural signs
• See sections on physical and sexual abuse • Carrying weapons • Have been the victim or perpetrator of serious violence (eg knife crime) • Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection • 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 • Have their bank accounts used to facilitate drug dealing	• Self-harming • Persistently going missing from School or home and/or being found out of area • Deterioration in mental well-being • Unexplained acquisition of money, clothes or mobile phones • Excessive receipt of texts/phone calls and/or having multiple handsets • Relationships with controlling older individuals or groups • Significant decline in School performance • Gang association or isolation from peers or social networks • Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

Prior Park Gibraltar

Female genital mutilation (FGM)

Physical signs	Behavioural signs
• Difficulty walking, sitting or standing • Bladder or menstrual problems • Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C	• Abroad for a prolonged period • Unusual behaviour after a period of absence • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • 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 • Failure to return from a visit to the country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger • May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Grooming

Physical signs	Behavioural signs
• See section on sexual abuse	• Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people • Using drugs and/or alcohol • 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 • Glorifying violence • Evidence of possessing illegal or extremist literature • A sudden disrespectful attitude towards others • Increased secretiveness, especially in relation to internet use • Unwillingness or inability to discuss their views • Increasingly judgemental or argumentative • 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 • Self-harm • Unexplained bruises or marks • Complaints of physical symptoms such as tummy aches	• Wary of adults • Aggression, acting out witnessed events • Difficulty concentrating • Difficulty developing relationships • Reduction in attendance and/or attainment • Low self-esteem, depression or anxiety • Substance misuse • Inappropriate relationships

At Prior Park Gibraltar 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 mindset 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

CSA - 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

Safeguarding children who may have been trafficked - DfE and Home Office guidance
Care of unaccompanied migrant children and child victims of modern slavery – 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
Preventing Child Sexual Exploitation – The Children's Society and Home Office

Confidentiality

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

Drugs

From harm to hope: A 10-year drugs plan to cut crime and save lives (April 2022) - Home Office strategy
Honest- 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
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 students 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

Understanding and responding to AI-generated child sexual abuse material: guidance from the National Crime Agency's CEOP Education programme in collaboration with the Internet Watch Foundation.

Financially motivated sexual extortion (FMSE): guidance for education settings on FMSE from the National Crime Agency's CEOP Education programme.

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
https://www.gov.uk/guidance/safeguarding-and-remote-education
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
2019 UK CMOSs' advice - UK CMO commentary on screen time and social media map of reviews - GOV.UK

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.
Shore Space The Lucy Faithfull Foundation in collaboration with the Home Office, has developed Shore Space, an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.
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

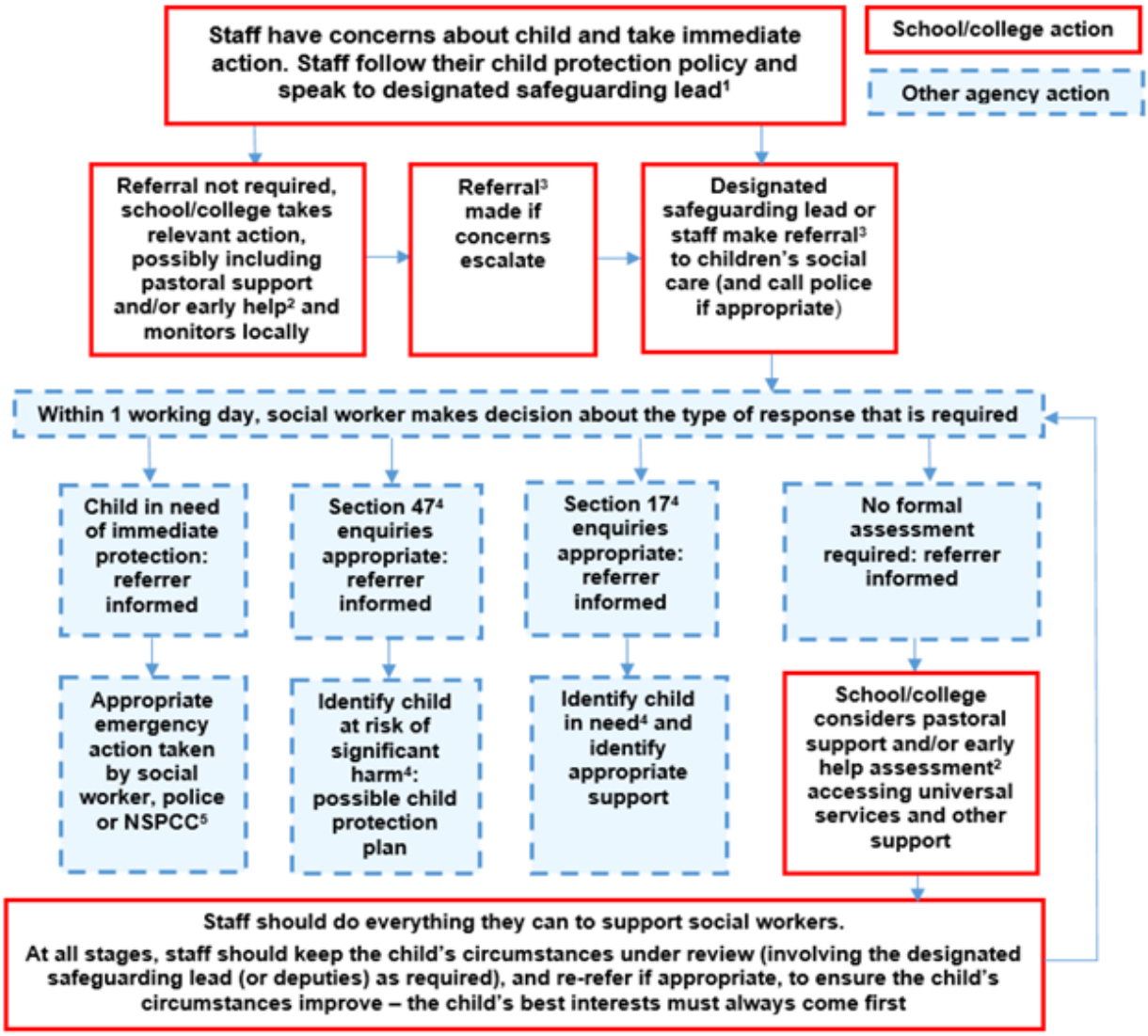
London Grid for Learning-collection of advice - Various information and resources dealing with the sharing of nudes and semi-nudes.
UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people - Advice for schools and colleges on responding to incidents of 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 2026

Figure 1: Flowchart setting out the actions taken 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] Family 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 Family Help, a family help inter-agency assessment should be arranged. Working Together to Safeguard Children provides detailed guidance on the Family Help process.

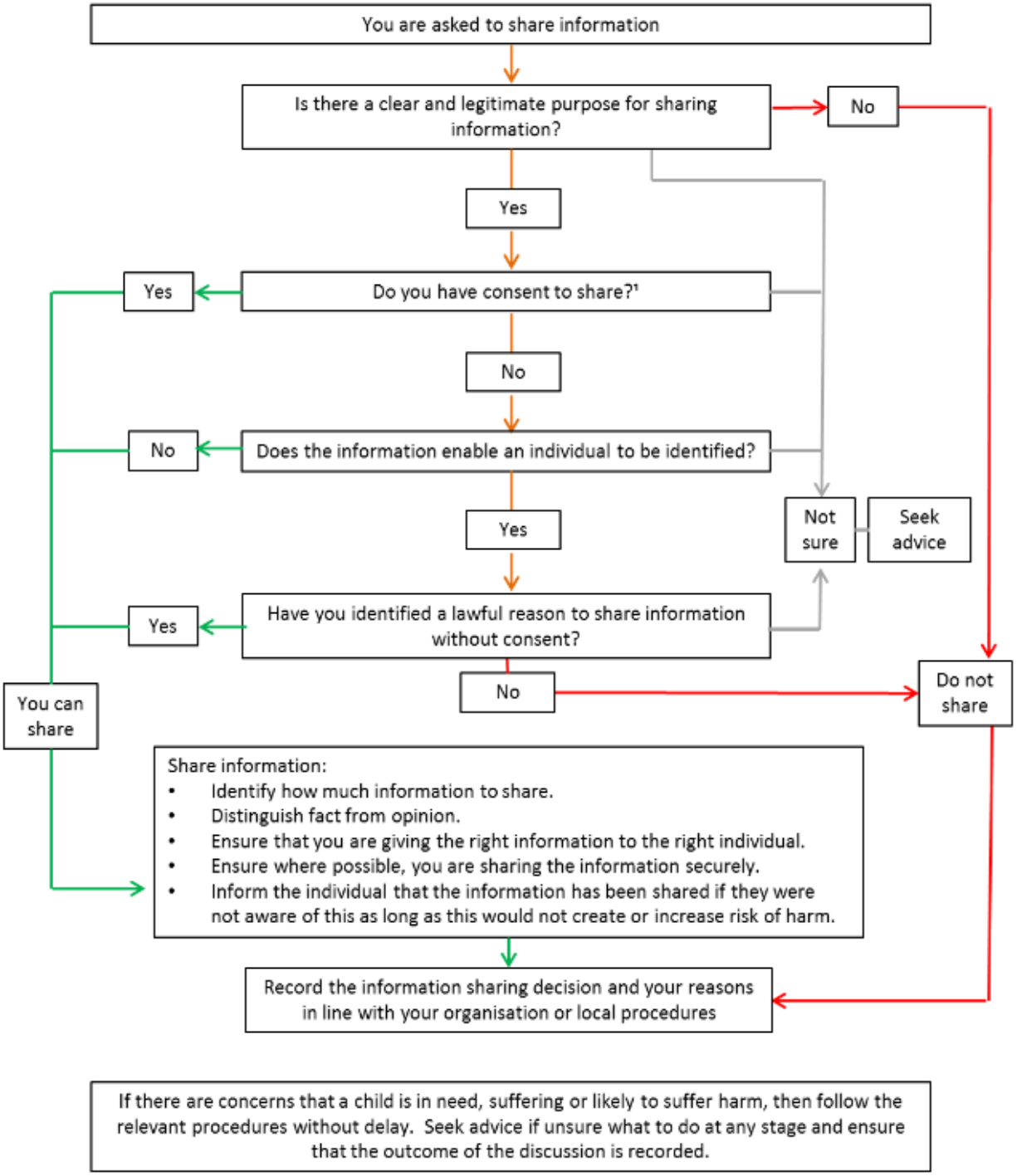
[3] Referrals should follow the process set out in the local threshold document and local protocol for assessment. See Working Together to Safeguard Children.

[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 Working Together to Safeguard Children.

[5] This could include applying for an Emergency Protection Order (EPO).

Prior Park Gibraltar

Appendix 4: Flowchart of when and how to share information



Prior Park Gibraltar

Appendix 5:

Role and Job Description of the Designated Safeguarding Lead (and DDSLs)
(Annex B from KCSIE 2026)

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads
It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability
During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and/or Microsoft Teams or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out-of-hour/out of term activities.

To ensure continuity of safeguarding responsibilities, schools should implement robust cover arrangements for periods when the DSL is unavailable due to illness, leave, or other circumstances. Schools and colleges have the flexibility and discretion in how these arrangements operate, provided safeguarding responsibilities remain appropriately covered. It would be good practice that, whenever the DSL is unavailable, there is a clear, reliable, and known arrangement in place so that concerns can be raised. This could, for example, include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

Manage referrals
The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care,
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme,
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff,
- act as a point of contact with the safeguarding partners,
- liaise with the Head or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019,
- 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,
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENDCOs), or the named person with oversight for SEND 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,
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health,
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances, and
- work with the Head 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 at school or college. This includes:
    - ensuring 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
    - supporting 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.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Safeguarding records should be clear, factual, and distinguish between observed concerns, professional opinion, and historic information. Records should include:

- a clear and comprehensive summary of the concern,
- details of how the concern was followed up and resolved, and
- 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 is shared, this happens in line with information sharing advice set out in Parts one and two of this guidance.

Appropriate arrangements should be in place to ensure that safeguarding information is transferred, reviewed and actioned promptly at all transition points, including in-year moves.

Where children leave the school or college (including in year transfers) the designated safeguarding lead 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 pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Where child protection files are transferred, the exporting school or college should include a clear, structured summary identifying current safeguarding concerns, relevant context, and any ongoing support needs.

Particular care should be taken to distinguish between current safeguarding concerns and historic information, ensuring that past issues are presented with appropriate context. For example, where a file contains extensive historical information, a concise summary of current risk and relevant context is likely to support more effective safeguarding than the transfer of unstructured records alone.

Receiving schools and colleges should ensure that safeguarding information is reviewed by an appropriately trained member of staff so that key risks and needs are clearly understood. Safeguarding information should be used to support, not disadvantage, the child.

Where the receiving school or college considers that safeguarding information is unclear or incomplete, it should seek clarification where necessary to support effective safeguarding.

They should also ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENDCOs) or the named person with oversight for SEND in colleges, are aware as required. It will then be for the DSL to consider what other information should be shared with other relevant staff and when this should be shared.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or

college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. It would be good practice for a conversation to take place at the appropriate and relevant points between the designated safeguarding leads at both settings, where there are issues or concerns to ensure information is being actively considered and acted upon.

Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part-time staff,
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this,
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this,
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing information about 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.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should 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 designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads (and any deputies) 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 local authority children's social care, so they:

- understand the assessment process for providing family help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements,
- 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,
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children,
- 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,

- 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,
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners,
- 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 radicalisation,
- 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,
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online,
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead (and deputies) in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead (and deputies) should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners,

- understand relevant data protection laws, and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

Appendix 6: What to do if a child goes missing

All staff need to respond in a systematic fashion if they become aware of a missing child; this can occur on a school trip/outing, or during the normal school routine. Registration of forms and classes ensures routine vigilance.

If an absence is noted, immediate steps must be taken:

1. Gather the group (for example, the whole House, class or those on a trip) and ask for information.

    a. If on a trip, the Trip Leader should ring the student's mobile telephone number. Attempt to establish whereabouts.

    b. If in class, email reception to establish if they are at the first aid station or left the premises for a legitimate reason.

2. HT/Senior Staff to contact parents (within an hour), both to seek information and to inform.

3. HT/Senior Staff to record (in writing) all relevant facts.

4. Alert all Staff using any sensible and effective means considered appropriate.

5. Arrange a site search by staff. Include local off-site areas.

6. On school trips, contact the Emergency Contact.

7. HT/Senior Staff to contact Royal Gibraltar Police Safeguarding Team.