

SAFEGUARDING AND CHILD PROTECTION POLICY

**For all pupils Inc EYFS
Prior Park Paragon**

Policy Owner DSL/Deputy Head Pastoral	Applies to Prior Park Paragon	Superseded documents TP Safeguarding Policy v4
Associated documents All PPP specific and PPS Associated Safeguarding Policies (as detailed within the policy)	Review frequency Every year (unless the legislation/regulations update before this time) Implementation date 14 September 2026	Legal Framework See Section Two

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:	Deputy Head Pastoral and DSL (Mrs S James), Head (Mr M Bond)) 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

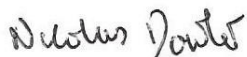
Policy Approved by: Safeguarding Trustees Mr Nic Dowler and Mr Paul Lyon  	Date: 1 September 2026
Designated Safeguarding Lead: Mrs Sarah James 	Date: 1 September 2026
Chair of Trustees: Mr David Catlow 	Date: 1 September 2026

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1. Safeguarding Contact Details

Prior Park Paragon

Position	Name	Contact details
Head	Malcolm Bond	Mbond@priorparkschools.com
Designated Safeguarding Lead (DSL) including EYFS, Prevent and E-Safety Lead	Sarah James	sjames@priorparkschools.com
Deputy Designated Safeguarding Lead (DDSL)- Responsibility for Looked After Children	Justin Ryan	jryan@priorparkschools.com
Deputy Designated Safeguarding Lead (DDSL) - Wellbeing and Nurture Lead	Rachel Hammonds	Rhammonds@priorparkschools.com
Deputy Designated Safeguarding Lead	Toby Goodman	Tgoodman@priorparkschools.com
Mental Health Lead	Beth Stone	Bstone@priorparkschools.com
Trustee with Safeguarding Responsibility	Paul Lyon Nic Dowler	PLYon@priorparkschools.com Ndowler@priorparkschools.com
Chair of Trustees	David Catlow	dcatlow@priorparkschools.com

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

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

Who to contact with a concern about an adult?

Deputy Safeguarding Lead and Local Authority Designated Officer (LADO)	Katie Williams	01225 396810 LADO@bathnes.gov.uk
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Other BANES useful contacts

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

Other useful contact details

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

2. Introduction

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

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; 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; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education)

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

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 Paragon'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.

This policy is published on Prior Park Paragon'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.

The policy is drafted in accordance with Bath & North East Somerset Community Safety and Safeguarding Partnership (BCSSP) agreed local interagency procedures.

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

- Keeping Children Safe in Education (DFE Sept 2026)
- The [Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#) (as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex and sexual orientation), in addition to any signs of faith-based prejudice. This means our trustees and head should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting a specific group of pupils (where we can show it's proportionate). This includes a duty to make reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as: sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination
- [Operation Encompass statutory guidance](#), which explains that the police must notify our school of any incidents involving domestic abuse
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the '2018 Childcare Disqualification Regulations') and Childcare Act 2006, which set out who is disqualified from working with children [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)
- Online Safety Act 2023
- Crime and Policing Act 2026
- This policy also meets the requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

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

This should include (but not limited to) the:

- Safeguarding and Child Protection Policy
- Positive Behaviour Policy
- Staff Code of Conduct
- safeguarding response to children who are absent from education for prolonged periods and/or repeated occasions.
- role of the Designated Safeguarding Lead (Included in this policy)
- Annual face to face safeguarding training by the DSL
- Annual on-line National College courses

All staff, Trustees and volunteers must read this policy alongside the applicable parts of KCSIE

- Everyone should read **Part One** and understand their responsibilities as described
- Additionally, all staff with **direct** contact with children should read **Annex A**
- The Head, SLT, DSL and DDSLs should read the whole of KCSIE
- All Trustees should read the whole of KCSIE.

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. Definitions

Safeguarding and promoting the welfare of children means:

- 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
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities 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.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for an area in the LA area

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

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

3.1 Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 14)
- Are missing or absent from education for prolonged periods and/or frequently
- Whose parent/carers has expressed an intention to remove them from school to be home educated

4. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Trustees at the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

Prior Park Paragon 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 relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - 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, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, honour or faith-based abuse violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

- Understanding (when age appropriate and in an age appropriate way) online harm such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to get help
- Personal Safety

4.1 All staff

All staff will:

- Read and understand at least part 1 of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education (KCSIE) in full, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have read and reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (for example, sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, Online Safety Policy, and the safeguarding response to children who go missing from education/who are absent from education.
- Be aware of the school's unauthorised absence procedures and children missing education procedures
- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- The process for community-based Family Help assessments
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The safeguarding issues that often overlap and can put children at risk of harm, including:
 - Drug taking and/or alcohol misuse
 - Unexplainable and/or persistent absences from education
 - Serious violence, criminal exploitation (including that linked to county lines), radicalisation
 - Consensual and non-consensual making or sharing of nudes or semi-nudes
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that mental health 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
- That children who are (or who are perceived to be) lesbian, gay or bisexual can be vulnerable to discriminatory bullying
- The potential vulnerabilities of children who are questioning their gender
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

4.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Sarah James, Deputy Head, Pastoral and DSL. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of school hours, if necessary, the DSL can be contacted via email or Teams.

When the DSL is absent, a Deputy DSL, as named above, will act as cover and staff will be informed who this is on the daily cover sheet. The safeguarding team have full access to CPOMS and the cover DDSL will be alerted to any concerns that have been raised so they can action them immediately.

In addition, if the DSL is absent, any urgent external safeguarding concerns will be redirected, via an out of hours message, to a shared email safeguardingteam.ppp@prioraparkschools.com to which all of the safeguarding team, as well as the Head, have access to enable immediate action of any urgent concerns.

If, in the unlikely event, the DSL and DDSLs are not available or absent, the Head will step into cover for the Safeguarding Team. The Head has full access to CPOMS, our safeguarding reporting system, and will act on any serious concerns logged during the time the DSL and DDSLs are unavailable or absent. Any issues needing immediate response from external agencies will be forwarded to the safeguarding team email address, by the reception team, for action.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service (DBS), and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- Keep the Head informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of police investigation or search
- Ensure that child protection files are kept up to date
- Where children leave the school, ensure their child protection file is transferred to the new school

The full responsibilities of the DSL and DDSs are set out in their job description.

4.3 The Board of Trustees

The Board of Trustees will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Ensure that all read **at least part 1** of Keeping Children Safe in Education (KCSIE)
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level safeguarding lead to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure the school has a policy in respect of the use of restrictive interventions, including the use of reasonable force and which reflects that the adoption of a 'no contact' policy can leave staff unable to fully support and protect pupils
- Ensure the school has appropriate cyber security systems in place
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness at least once every academic year. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Ensuring that reviews should be carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT team. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. A record of these checks will be kept
 - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

The Board of Trustees will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, trainee teachers, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

In cases where an allegation of abuse is made against the Head, Prior Park Schools COO will, normally, act as 'case manager' and Chair of Trustees will be kept informed throughout (see appendix 3).

4.4 Nominated Safeguarding Trustee(s)

PPS have appointed Paul Lyon and Nic Dowler as the nominated Safeguarding Trustees, and they take lead responsibility for monitoring safeguarding arrangements at Prior Park Paragon and across the Trust. Although all Trustees understand that the Board of Trustees is ultimately responsible for ensuring safeguarding and child protection policies, procedure and practices are in line with all statutory guidance.

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

- A formal meeting about safeguarding matters with the DSL at least once a term and more regularly, if needed;
- A formal meeting with all PPS DSLs, HOC and HOHR at least once a term (Formal Safeguarding Committee meeting)
- liaising with the local authority and/or partner agencies if and where appropriate;
- conducting an annual audit of the School's safeguarding procedures and submitting a written report to the Board of Trustees with recommendations for further improvements. The annual written report will typically consider:
 - the effectiveness and implementation of relevant policies;
 - staff safeguarding training;
 - staff recruitment procedures;
 - the handling of safeguarding issues;
 - referral management;
 - the contribution the School is making to inter-agency working;
 - 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.

4.5 The Head

The Head is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, and devices like mobile phones and cameras in the setting

4.5 Virtual school heads

Virtual school heads (VSHs) have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

VSHs also have a non-statutory responsibility to promote the educational achievement of children in kinship care (children who live with a relative or close family friend).

They should also identify and engage with key professionals, for example DSLs, special educational needs co-ordinators (SENDCOs), social workers, mental health leads and others.

4.6 B&NES Children's Services

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

- co-ordinating the delivery of integrated children's services within B&NES, including an early help service
- providing statutory social work services under the Children Act 1989 and the Children and Social Work Act 2017; Working Together 2023; Keeping Children Safe In Education 2026 and all associated guidance and other relevant legal frameworks
- providing the maintained schools with advice, support and guidance, model policies and procedures, training in relation to all aspects of safeguarding children
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated

- sharing with the designated safeguarding lead if a child has a social worker. This information should be used to inform decisions in the best interests of the child's safety.

4.7 Working with Parents and Carers

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

- make parents aware of the school's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on 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 pupils need extra support.

4.8 Multi-Agency Working

Prior Park Paragon 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 B&NES Community Safety & Safeguarding Partnership (BCSSP) to ensure joint working with partner agencies in order to improve outcomes for children in B&NES. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow the BCSSP arrangements.

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

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

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

5. Confidentiality, Information Sharing and Data Protection

Prior Park Paragon recognises that effective safeguarding depends upon timely, lawful and proportionate information sharing. Staff will treat information about pupils and their families with respect and confidentiality. However, confidentiality is not absolute where a child may be at risk of harm or where information sharing is necessary to safeguard or promote a child's welfare.

The School complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and relevant safeguarding legislation. Data protection legislation does not prevent or limit the sharing of information where this is necessary to keep children safe.

Information will be shared on a need-to-know basis with relevant members of staff, including the Designated Safeguarding Lead (DSL) and Deputy DSLs, and where appropriate with other schools within the Prior Park Schools family, local authority children's social care, the local safeguarding partners, the police, health services and other relevant agencies. Decisions about information sharing will be made with the best interests of the child as the overriding consideration and in accordance with statutory guidance, including *Keeping Children Safe in Education* and *Working Together to Safeguard Children*.

When deciding what information to share, staff should consider:

- The relevancy of the information, including to the current safeguarding risk
- What is necessary for the receiving setting to know
- Whether it is clearly presented and appropriately contextualised.

The DSL, or staff sharing information, will ensure that any information is focused and proportionate. This may include the summarising or omitting of information which is not necessary for safeguarding purposes.

As part of meeting a child's needs, it is important that Trustees recognise the importance of information sharing between practitioners and local agencies. This includes ensuring arrangements are in place and understood that set out clearly the processes and principles for sharing information within the school and with the local authority children's social care, safeguarding partners and other organisations, agencies and practitioners as required.

Further guidance regarding the collection, processing, storage, retention and sharing of personal information can be found in:

- Prior Park Schools Data Protection Policy
- Prior Park Schools Data Retention and Destruction Handbook
- Prior Park Schools IT Acceptable Use Policies
- Prior Park Schools Staff Code of Conduct

Information Sharing Principles

All staff should be aware that:

- timely information sharing is essential to effective safeguarding;
- fears about sharing information must never be allowed to stand in the way of protecting a child;
- information should be shared only with those who need to know it in order to safeguard and promote the welfare of a child;
- where special category personal data is involved, safeguarding legislation provides a lawful basis for processing and sharing information when necessary to protect a child;
- all information-sharing decisions should be recorded appropriately;
- if there is any uncertainty about whether information should be shared, staff must seek advice from the DSL or a Deputy DSL without delay.

- Staff must never give a child absolute assurances of confidentiality. Where a child discloses abuse, neglect, exploitation or any other safeguarding concern, staff should explain sensitively that information may need to be shared with those who can help keep them safe.

Transfer of Child Protection Files

- Where a pupil leaves Prior Park Paragon, the DSL will ensure that any safeguarding or child protection file is transferred securely and separately from the main pupil record to the receiving school or college as soon as possible, and within five working days for an in-year transfer or within the first five days of the start of a new term. Confirmation of receipt will be obtained.
- The DSL will also consider whether it is appropriate to share relevant safeguarding information with the receiving school or college before the child leaves in order to support a safe transition and ensure that appropriate safeguarding arrangements are in place from the outset,
- Confidentiality and information sharing are also addressed in Section 18 (Record Keeping) and Appendix 3 (Managing Allegations and Low-Level Concerns About Staff).
- Where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, it is incumbent on the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives.
- Upon receipt of any safeguarding or child protection files for new pupils joining Prior Park Paragon, the DSL will carefully consider the level of information that will be shared with staff to ensure the child is kept safe.

Where there are issues or concerns, the DSL from Prior Park Paragon will seek to have a conversation with the DSL from the receiving school to ensure that all concerns, risks and protective factors are fully understood, in addition to sending the relevant safeguarding or child protection files.

Reports of Sexual Violence and Sexual Harassment

Where a child reports sexual violence or sexual harassment, the School will carefully consider the wishes of the child while balancing its safeguarding responsibilities towards that child and others. The DSL will determine, in consultation with relevant agencies where appropriate, whether information should be shared and what action is required.

In considering any report, the DSL will have particular regard to:

- the wishes and feelings of the child;
- the need to protect the child and other children from harm;
- whether parents should be informed, unless doing so would place the child at greater risk;
- whether a referral to children's social care is required; and
- whether a report to the police is required.

The School will do all that is reasonably possible to protect the anonymity, privacy and dignity of children involved in reports of sexual violence or sexual harassment and will carefully manage the sharing of information within the School. Staff will also consider the risks posed by social media and the inappropriate sharing of information.

6. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect, exploitation and modern slavery and shall be alert to the potential need for early help for a child who:

- Has a disability or has certain health conditions and has specific additional needs

- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Has a mental health need
- Is a young carer
- Is pregnant and/or is a parent themselves
- Has exhibited early signs of abusive, violent and/or harmful behaviours
- Is bereaved
- Is showing early 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, care or home
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion and in alternative provision or a pupil referral unit
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised into terrorism
- Has a parent or carer in custody, or is affected by parental offending
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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 drugs or alcohol
- Has returned home to their family from care
- Is at risk of honour or faith-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child

Staff, volunteers and Trustees must follow the procedures set out below in the event of a safeguarding issue.

6.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

To report a concern to BANES that a child is at risk of immediate harm, complete the form here: [Report a concern about a child | Bath and North East Somerset Council](#)

Additionally, the following link is to the GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

6.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Write up your conversation as soon as possible in the child's own words onto CPOMS and speak to the DSL as soon as possible. Stick to the facts, and do not put your own judgement on it
- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

We will ensure that staff have sufficient understanding and use of English to ensure the well-being of children in their care. For example, to keep records in English, liaise with other agencies in English, be able to summon emergency help, and understand instructions, for example about the safety of medicines or food hygiene.

6.3 If you discover that FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education (KCSIE) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting' 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 7 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

6.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

If staff have any concerns about a child's welfare, they should act on them immediately. Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare.

All staff should follow Prior Park Paragon's Safeguarding and Child Protection Policy and, where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Safeguarding Team, or the Head, and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible and log on the child's record on CPOMS.

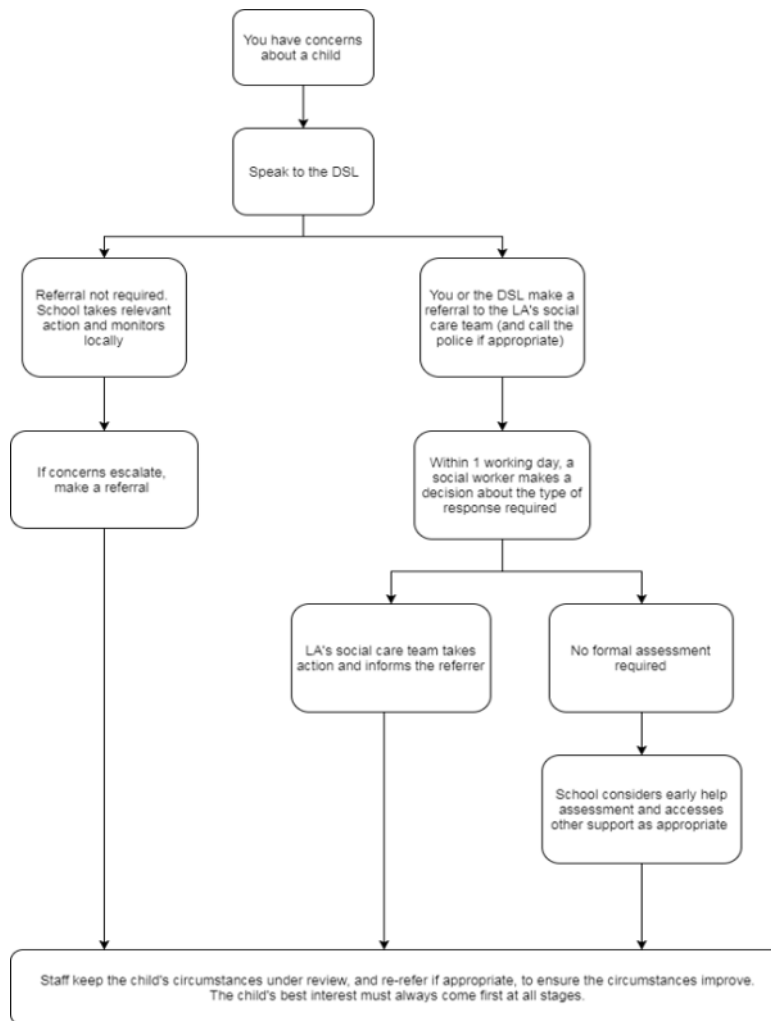
Options will then include:

- managing any support for the child internally via the school's pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
- undertaking a family help assessment, or
- making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible and log on CPOMS.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



Support before statutory intervention

Prior Park Paragon recognises that any child may benefit from support before statutory intervention, including from universal services and community based Early Help, or the targeted early help level of Family Help. In particular, some children may need additional support as they may:

- be disabled or has certain health conditions and has specific additional needs
- has special educational needs, whether they have an EHCP or not
- has a mental health need
- is a young carer
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn into anti-social or criminal behaviours, inc. gang involvement, association with organised crimes or county lines
- frequently missing, or goes missing, from education
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, 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
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage,
- is a privately fostered child.

Community-based Early Help assessment

If children do not require the support of statutory children's services, the designated safeguarding lead (or a deputy) will generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner (which is not limited to social workers).

Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children. Any such cases should be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Further information about BANES Early Help can be found here: [Get early help | Bath and North East Somerset Council](#)

Early Help Assessment

Sometimes it's obvious that a child or young person could benefit from receiving help early on, but it's not clear what type of help is best for them; they could have lots of needs, or their needs could be complex or unclear. An Early Help Assessment (EHA) can help ensure that they get the right help.

An EHA helps us consider the needs of a child or young person and their family, bringing together a team of professionals to support them all to achieve positive change.

Further information about BANES Early Help Assessment can be found here: [Early Help Assessment | Bath and North East Somerset Council](#)

Referrals to Family Help – including targeted Early Help and local authority children's social care

Some children and families may require more targeted support than that offered at the universal and community based Early Help level. The [FFP Programme guide: delivery expectations for statutory safeguarding partners in England: year 2 \(2026 to 2027\)](#) provides a toolkit to assist safeguarding partners set up effective Family Help models to identify children and families who would benefit from more targeted support through Family Help.

Family Help means both targeted early help and support and services delivered under s.17 of the Children Act 1989.

Targeted early help services delivered through Family Help are coordinated by a local authority and/or their partners to address specific concerns within a family. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services. Targeted early help may be appropriate for children and families who have multiple and or complex needs. It is a voluntary approach, requiring the family's consent.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible and log on the child's CPOMS.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures [BCSSP Escalation Procedure](#) to ensure their concerns have been addressed and that the child's situation improves.

To make a referral local authority information can be found here: [Make a referral to Children's Services | Bath and North East Somerset Council](#)

6.5 If you have concerns about extremism

If a child is suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken.

Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral and log on CPOMS.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and Trustees can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Further information can be found in the Prior Park Schools Prevent Duty Policy.

6.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Mental health problems can also, in some cases, develop into safeguarding concerns (for example, self-harm).

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

However, staff will be alert to behavioural signs that suggest a child 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, including:

- 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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 6.4. If you feel that a child is in danger, call 999 or arrange for the child to be taken to A&E immediately by their parent or other suitable person.

If the child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action and log on the child's CPOMS record.

For more information, refer to Prior Park Paragons Mental Health and Wellbeing Policy.

In addition, refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

6.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) posing a risk of harm to children, speak to the Head/DSL as soon as possible. You should also complete a Low-Level Concern form which is found on the staff portal, this will alert the Head, DSL, Head of HR (HOHR) and Head of Compliance (HOC) to your concern.

The Head/DSL/HOHR or HOC will then follow the procedures set out in Prior Park Schools Low Level Concerns Policy, if appropriate.

If the concerns/allegations are about the Head, you should contact/speak to the Chair of Trustees. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, trainee teacher, volunteer or contractor) to the Head, or by completing the LLC form, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, for concerns raised within our EYFS, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

6.8 Allegations of abuse made against other pupils – Child-on-child abuse

Prior Park Paragon recognises that children are capable of abusing their peers and that child-on-child abuse can occur both inside and outside school, including both online and offline and may take place simultaneously across both environments. We adopt a contextual safeguarding approach and recognise that abuse can occur within friendship groups, in the wider community, during journeys to and from school, and in places where children gather before or after school.

Child-on-child abuse will never be tolerated or dismissed as:

- "banter";
- "just having a laugh";
- "part of growing up"; or
- "boys being boys".

Such attitudes can lead to a culture of unacceptable behaviour, misogyny, misandry, discrimination and an unsafe environment for children.

Child-on-child abuse can occur at any age and staff should remain vigilant to inappropriate, harmful or abusive behaviour between pupils, including younger children.

For some forms of child-on-child abuse it is recognised that girls are more likely to be victims and boys more likely to be perpetrators. However, all child-on-child abuse is unacceptable and will be taken seriously regardless of the sex, gender, age or characteristics of the children involved.

Most cases of pupils hurting other pupils will be managed through the School's Behaviour Policy. However, this Safeguarding and Child Protection Policy will apply where behaviour raises safeguarding concerns.

Child-on-child abuse may include, but is not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- physical abuse, including hitting, kicking, shaking, biting, hair pulling or other physical harm;
- serious physical assault and harm, or threat of harm, with a weapon;
- sexual violence and sexual assault;
- sexual harassment, both online and offline;
- harmful sexual behaviour;
- abuse within intimate personal relationships;
- causing someone to engage in sexual activity without consent;
- child sexual exploitation or child criminal exploitation;
- upskirting;
- initiation or hazing-type behaviours;
- the consensual or non-consensual sharing of nude or semi-nude images or videos, including AI-generated images;
- behaviour linked to misogyny, misandry, radicalisation or harmful online influences.

The School recognises that children with SEND and some other vulnerable groups may face additional barriers to recognising, reporting or disclosing abuse and may be disproportionately affected by child-on-child abuse.

6.9 Responding to Child-on-Child Abuse

If a pupil makes an allegation of abuse against another pupil, staff must:

- record the concern on CPOMS as soon as possible;
- report the concern immediately to the DSL;
- not investigate the matter themselves.

The DSL will determine the appropriate course of action, which may include:

- consultation with or referral to Children's Social Care;
- consultation with or referral to the Police;
- implementation of appropriate safeguarding measures;
- completion of a risk assessment;
- support plans for all pupils affected;
- consideration of Early Help, pastoral support, counselling or CAMHS involvement where appropriate.

The welfare of all children involved will be carefully considered. The school recognises that child-on-child abuse is a safeguarding issues for both the victim and alleged perpetrator and appropriate support will be provided to both the victim, the alleged perpetrator and any other pupils affected by the incident. When undertaking risk assessments, the School will take account of the wishes of the victim, the nature of the incident, any power imbalance, ongoing risks and wider contextual safeguarding factors.

Where criminal investigations are underway, the School will work closely with the Police and other agencies whilst continuing to fulfil its safeguarding responsibilities and maintain appropriate support for pupils.

For details of the schools' procedures for recording, investigating and dealing with allegations, supporting victims, perpetrators and any other children affected, refer to Prior Park Schools Child on Child Abuse Policy.

6.10 Creating a Safe Culture

Prior Park Paragon is committed to creating an environment in which pupils feel safe to report concerns and know that they will be taken seriously. We understand that through proactive, timely, evidence-based support children can usually be prevented from going on to commit child-on-child abuse or violence.

To achieve this, we will:

- challenge inappropriate, abusive, discriminatory or sexualised language and behaviour;
- take a proactive approach to preventing bullying, harassment and abuse;
- educate pupils about healthy relationships, boundaries, respect, consent, online safety and appropriate behaviour through our curriculum;
- ensure pupils know how to report concerns;
- ensure staff understand that child-on-child abuse can occur even where there are no reported incidents;
- maintain an attitude of "it could happen here";

- recognise that a child displaying harmful behaviour may have experienced abuse themselves;
- recognise the impact that social media, online platforms and harmful influencers may have on children's attitudes and behaviour;
- challenge misogynistic, misandrist, discriminatory and harmful attitudes wherever they arise;
- provide ongoing staff training on recognising, preventing and responding to child-on-child abuse.

The DSL will oversee safeguarding responses to incidents of child-on-child abuse and will ensure appropriate records, risk assessments and support plans are maintained and reviewed.

For detailed procedures regarding the reporting, investigation and management of child-on-child abuse, sexual violence and sexual harassment, staff should refer to the Prior Park Schools Child-on-Child Abuse Policy.

6.11 Making or sharing of nudes and semi-nudes, including where generated by AI

For the purposes of this policy, the term 'making or 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 this policy.

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'.

Your responsibilities when responding to an incident

All incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual, require a proportionate safeguarding response. If you are made aware of an incident involving the consensual or non-consensual making or sharing of nude or semi-nudes, including where generated by AI, you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident, the Head and other members of

Prior Park Schools senior leadership where appropriate. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to 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 young person (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 (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 7 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to their SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the making or sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Head and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101, completing the form here: [Tell us about vulnerable or exploited people, exploiters, or organised crime | Avon and Somerset Police](#).

Further information can be found here: [Child self-generated indecent imagery | Avon and Somerset Police](#)

Recording incidents

All incidents of making or sharing of nudes and semi-nudes, including where generated by AI, and the decisions made in responding to them, will be recorded on the schools safeguarding reporting system, CPOMS.

Curriculum coverage

Through our Relationship Education and Personal Development Programme, and Computing Curriculum, we explore with children what and how they should share online.

This is approached in an age-appropriate way which will strengthen children's understanding of their rights and responsibilities when sharing photos or images of themselves and others, including AI generated images, online. For more information, refer to Prior Park Paragons PD/RE Policy and Scheme of work.

6.12 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Have systems in place for pupils to confidently report abuse and concerns
- Ensure our reporting systems are known, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

At Prior Park Paragon, we ensure pupils have the confidence to report concerns by:

- Reinforcing the concept of 'safe adults' throughout our PD/RE curriculum, assemblies and class discussions
- Have clear posters on display throughout the school showing the children who they can talk to if they have a concern, in addition to their class teacher
- Through promoting positive pupil and teacher relationships, children feel confident to talk to any adult about any concern they may have
- Each class has a 'worry box' or mechanism for a child to leave a note for their class teacher to read if they feel they, or a friend, may need support
- Ensure staff have adequate training that they reassure a child that any disclosure they make will be taken seriously and they were right in raising it.

6.13 Contextual Safeguarding

Prior Park Paragon recognises that safeguarding incidents and behaviours can be associated with factors outside the school environment and can occur between children outside school, including online. This is known as contextual safeguarding.

Children may be vulnerable to abuse, exploitation or harmful influences in a range of settings beyond their home. These can include the local community, friendship groups, social media, online gaming platforms, public spaces, transport routes, school journeys, extracurricular activities and places where children may gather before or after school.

All staff, and particularly the safeguarding team, will consider whether children may be at risk of harm in these wider contexts when assessing safeguarding concerns.

Extra-familial harm can take many forms, including:

- child sexual exploitation (CSE);
- child criminal exploitation (CCE);
- county lines activity;
- serious violence and youth violence;
- child-on-child abuse;
- harmful sexual behaviour;
- online abuse and exploitation;
- radicalisation and extremism.

Information about places where pupils may congregate before and after school, or during journeys to and from school, should be taken into account when considering a child's safety and wellbeing and shared with the DSL where appropriate.

7. Online safety and the use of mobile technology

At Prior Park Paragon, we recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school will:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and Trustees – and these are tested monthly and audited annually
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Set clear guidelines for the use of mobile phones for the whole school community, including the expectation that our school is a mobile phone-free environment by default
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual

or physical violence, misinformation, disinformation (including fake news) and conspiracy theories

- **Contact** – being subjected to harmful online interaction with other users or generative AI applications that simulate this, such as 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
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images including those generated using AI and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyberbullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras – unless they are following the Prior Park Schools specific guidelines for taking and storing photos
- Make pupils In Years 5&6, staff, volunteers and Trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems (for more information refer to Prior Park Paragons Online Safety Policy).

The specific filtering and monitoring systems used are:

- Cisco Meraki - the school's network system has content filtering in place which has been set up to ensure children are not able to access, via the internet in school, inappropriate content.

- Bitdefender – this has been installed on all school owned devices and is an end point security system that protects against virus/malware threats that could expose children's data, as well as providing a further layer of content filtering.
 - Securly – this filtering and monitoring system monitors the low-level detail of what the children are typing and accessing and ensures that children are not able to access uncensored web content. Securly will inform the safeguarding and IT teams of any attempt to access inappropriate content so that it can be followed up. Additionally, it will log any concerning activity for the safeguarding team to follow up with the child.
 - SENSO – this enables staff to view all pupils' computers and monitors in real-time to support all pupils to ensure they are accessing the correct material and work.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
 - Carry out an annual review of our filtering and monitoring effectiveness. This will be conducted by our DSL, Head of Compliance, Safeguarding Trustee and IT support
 - Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
 - Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

Responsibilities:

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

Prior Park Paragon 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](https://www.gov.uk/government/publications/plan-technology-for-your-school-service)

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy, EYFS Policy and mobile phone policies which can be found on our website.

Use of mobile phones and personal cameras within our EYFS years is clearly set out in Appendix 1 below and follows the requirements in the [statutory framework for the Early Years Foundation Stage](#)

7.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Prior Park Paragon recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (for example, bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Prior Park Paragon will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-Bullying, Behaviour and Artificial Intelligence policies.

Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education (KCSIE). Any nude or semi-nude images made using AI will be dealt with as set out above and treated as a safeguarding concern.

7.2 Cyber Attacks

Prior Park Paragon 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>

8. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, for example, moving them out of classes with the victim, and the reason(s) behind any decision(s)

9. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges both online and offline. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse
- The need for intimate care or that these children are isolated from others
- That these children are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or being unable to understand the consequences of doing so

We offer extra pastoral support for these pupils and will determine this on an individual basis. This may include:

- Daily, or more frequent if required, check ins with a safe adult of the child's choosing
- Specific risk assessments if required
- All staff made aware of any additional requirements through our pastoral concerns process
- Support for the child to communicate in a way they feel comfortable
- 1:1 nurture sessions
- Counselling sessions
- Liaison with external agencies

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENDCO. The school consider extra pastoral support and attention for these children and ensure any appropriate support for communication is in place.

9.1 Alternative Provision

Where Prior Park Paragon places a pupil with an alternative provision provider, the School remains responsible for the safeguarding, welfare and educational outcomes of that pupil.

The School recognises that pupils requiring alternative provision may have additional vulnerabilities and may be at greater risk of harm, exploitation or educational disadvantage. As such, safeguarding considerations will form a central part of the placement, monitoring and review process.

Before placing a pupil in alternative provision, the School will satisfy itself that:

- the provision is suitable for the pupil's age, ability, aptitude and individual needs, including any SEND or medical needs;
- appropriate safeguarding arrangements are in place;
- staff working within the provision have undergone appropriate safer recruitment and safeguarding checks;
- effective systems exist for attendance monitoring, information sharing and safeguarding reporting; and
- the placement is in the best interests of the child.

The School will obtain written confirmation from the alternative provision provider that all required safeguarding and recruitment checks have been completed on staff working with pupils. The provider must also notify Prior Park Paragon of any significant changes that may affect safeguarding arrangements, including changes to staffing, leadership or provision.

The School will always know where a pupil is educated during school hours and will maintain accurate records of:

- the address of the alternative provision;
- any satellite sites or subcontracted provision used; and
- key contacts responsible for safeguarding and pupil welfare.

The School will maintain regular contact with the alternative provision provider and will review placements at least half-terminally to ensure that:

- the pupil is attending regularly;
- safeguarding arrangements remain effective;
- the placement continues to meet the pupil's needs; and
- the pupil is making appropriate progress.

Where safeguarding concerns arise, the School will undertake an immediate review of the placement and, where necessary, take action to secure the child's safety, including ending the placement if appropriate.

The Designated Safeguarding Lead (DSL) will ensure that relevant safeguarding information is shared appropriately with the alternative provision provider and that safeguarding concerns arising within the provision are communicated promptly to the School.

The School will have regard to the Department for Education's statutory guidance on:

- *Alternative Provision;*
- *Education for Children with Health Needs Who Cannot Attend School;*
- *SEND Code of Practice: 0 to 25 Years;* and
- *Supporting Pupils at School with Medical Conditions.*

9.2 Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition

might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

9.3 Young carers

The school recognises that caring responsibilities can impact on a child's education, attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

9.4 Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

9.5 Looked-after and previously looked after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained DDSL, Justin Ryan, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- If necessary, work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

10. Pupils who are lesbian, gay or bisexual, or questioning their gender

Prior Park Paragon recognises that a child being lesbian, gay, or bisexual is not in itself a risk factor for harm.

However, pupils who are (or who are perceived by other children to be) lesbian, gay, or bisexual can sometimes be vulnerable to discriminatory bullying. Prior Park Paragon is clear that all forms of bullying, for whatever reason, is unacceptable and all staff will take a proactive and strong stand

against any forms of bullying. See our Anti-Bullying Policy and Gender Questioning Children Policy for more detail on how we prevent bullying based on protected characteristics and support children.

Any concerns should be logged as per our anti-bullying policy on CPOMS and reported to the DSL.

10.1 Supporting pupils who are questioning their gender

Prior Park Paragon 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.

All staff should keep in mind that it is common for children to engage in activities that are 'less typically associated' with their sex. For example, at primary school age, girls may play with trucks, or boys may dress in clothes that are perceived as feminine. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

10.2 Working with Parents and Carers

Prior Park Paragon recognises the importance of working in partnership with parents and carers and where instances of children question their gender the school will only respond where a child or their parent has raised a specific query.

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.

10.3 Decision-Making and Support

The School will take a careful, individualised and safeguarding-led approach to any request for support relating to gender identity.

If a child's parents initiate a request for social transition, staff members should not adopt any changes relating to the child presenting as the opposite biological sex unless a decision has been made by the school and the child's parents. For further information and guidance on this matter refer to the latest Government guidance including relevant sections in [Keeping children safe in education 2026 \(comes into force from 1 September 2026\)](#)

In considering any request, Prior Park Paragon 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.

10.4 Toilets, Changing Facilities and Overnight Accommodation

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

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 Paragon 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.

10.5 Physical Education and Sport

Prior Park Paragon 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.

At Prior Park Paragon, many competitive sporting activities from Year 3 onwards are organised separately for boys and girls. 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.

11. Complaints and concerns about school safeguarding policies

11.1 Complaints against staff

Complaints or concerns about a member of staff, volunteer, contractor, supply staff member, Trustee or any adult working on behalf of the School that may meet the harm threshold will be managed in accordance with Part Four of *Keeping Children Safe in Education (KCSIE) 2026*, local safeguarding procedures and the School's procedures for managing allegations against staff and volunteers.

In some circumstances the school may have to consider an allegation against an individual not directly employed by Prior Park Schools; for example, supply teachers, trainee teachers or contracted staff provided by an employment agency or business. Where this applies, the school will share safeguarding responsibilities with the employment agency or business. Prior Park Paragon understand that they remain responsible for gathering the facts and managing the safeguarding process, while working closely with the employment agency or business, which will usually lead on any disciplinary action.

Such concerns must be reported immediately to the Head. Concerns about the Head must be reported directly to the Chair of Trustees. Concerns regarding a Trustee must be reported to the Chair of Trustees or, where appropriate, the Safeguarding Trustee.

Further information can be found in Section 18 of this policy (Allegations Against Staff and Low-Level Concerns).

11.2 Other safeguarding complaints

Prior Park Paragon is committed to ensuring that all safeguarding concerns, complaints and challenges are taken seriously and addressed promptly.

Any member of staff, volunteer, parent, carer, pupil or visitor who has concerns about the way safeguarding is being managed at the School, including concerns about safeguarding policy, procedures, practice, staff conduct, site security, pupil welfare or the implementation of safeguarding arrangements, should raise these concerns without delay.

Concerns should normally be raised with:

- the Designated Safeguarding Lead (DSL);
- the Head;
- the Chair of Trustees; or
- the Safeguarding Trustee.

The School will ensure that concerns are listened to, investigated appropriately and responded to in a timely manner.

The School recognises the importance of a culture of openness, transparency and professional challenge and encourages all members of the school community to raise concerns where they believe safeguarding arrangements may not be effective or where a child may be at risk of harm.

11.3 Whistleblowing

Prior Park Paragon is committed to fostering a culture of openness, transparency and accountability where all staff feel able to raise concerns about safeguarding practice without fear of reprisal.

Any member of staff who has concerns about poor, unsafe or potentially unlawful safeguarding practice, the conduct of colleagues, failures in safeguarding procedures, or any action that may place a child at risk, should raise their concerns immediately.

Staff should normally raise concerns with:

- The Designated Safeguarding Lead (DSL);
- The Head;
- Chief Operating Officer;
- The Chair of Trustees or Nominated Safeguarding Trustee (where appropriate);
- The Head of Compliance or Head of Human Resources.

Concerns about the Head should be raised directly with the Chair of Trustees. Concerns about safeguarding that cannot be resolved internally, or where a member of staff feels unable to use internal procedures, may be raised directly with:

- The Local Authority Designated Officer (LADO);
- Children's Social Care;

- Ofsted (for EYFS-related concerns);
- The NSPCC Whistleblowing Advice Line.

The School will ensure that all concerns are taken seriously, investigated appropriately and responded to in a timely manner. No member of staff will suffer detrimental treatment or victimisation for raising a genuine safeguarding concern in good faith.

Further information can be found in:

- PPS Raising a Concern at Work (Whistleblowing) Policy;
- PPS Low-Level Concerns Policy;
- PPS Staff Code of Conduct;

11.4 EYFS Provision

In accordance with the Statutory Framework for the Early Years Foundation Stage, all staff working within the EYFS have a duty to raise concerns about any practice, behaviour or circumstance that may affect the safety, welfare or wellbeing of children. Staff must be aware of the School's whistleblowing procedures and how to access appropriate support and external reporting routes where necessary. The School will ensure that all EYFS staff receive safeguarding training, understand how to report concerns and are supported in putting safeguarding procedures into practice.

12. Record-keeping

Prior Park Paragon recognises that effective safeguarding relies on accurate, timely and secure record-keeping.

All safeguarding concerns, disclosures, discussions, decisions, actions taken and the rationale for those decisions will be recorded promptly on the School's secure safeguarding recording system, **CPOMS**. This includes concerns that do not result in a referral, as well as referrals to external agencies including Children's Social Care, the Police, Health Services, the Prevent Programme and Early Help services.

The School will maintain safeguarding records in accordance with:

- Keeping Children Safe in Education (2026);
- The Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR);
- The Data (Use and Access) Act 2025;
- PPS Data Protection Policy;
- PPS Data Retention and Destruction Handbook;

If staff are unsure whether information should be recorded, they should seek advice from the Designated Safeguarding Lead (DSL) or a Deputy DSL.

12.1 Recording Concerns

All staff must record safeguarding concerns as soon as possible after an incident, disclosure, conversation or observation.

Records must be:

- clear, factual, objective and professional;
- based on what was seen, heard or reported;

- free from personal opinion or speculation;
- completed using CPOMS as soon as practicable.

Safeguarding records will include:

1. a clear and comprehensive summary of the concern;
2. details of how the concern was followed up;
3. decisions made and the reasons for those decisions;
4. actions taken and outcomes achieved.

Where a child has made a disclosure, the record should include:

- the date, time and location of the disclosure;
- the child's own words wherever possible;
- what was said and done, by whom and in whose presence;
- any observable injuries, behaviours or non-verbal communication;
- details of any immediate action taken.

12.2 Storage and Confidentiality of Safeguarding Records

The School maintains electronic safeguarding records using CPOMS.

Safeguarding files are held separately from the main pupil record and access is restricted to authorised staff on a strict need-to-know basis, as determined by the DSL.

The School will ensure that:

- records are stored securely and confidentially;
- access is appropriately controlled;
- information is shared only where necessary to safeguard and promote the welfare of children;
- all information-sharing decisions are proportionate, lawful and recorded.

Safeguarding records will be retained in accordance with the Prior Park Schools Data Retention and Destruction Handbook.

12.3 Supporting Evidence

Any safeguarding evidence, including handwritten notes, witness statements, screenshots, messages, photographs or other material, must be passed to the DSL as soon as possible and stored securely.

No copies should be retained by individual members of staff unless specifically directed by the DSL.

Where appropriate, supporting evidence will be uploaded to the child's CPOMS record.

Where concerns involve an online safety incident, staff should avoid viewing, copying, forwarding or storing illegal images of a child and must follow the procedures set out elsewhere in this policy regarding nude and semi-nude imagery.

12.4 Information Sharing

The School recognises that effective safeguarding requires timely and appropriate information sharing. Information may be shared with:

- local authority children's social care;
- the Police;

- health professionals;
- safeguarding partners;
- Early Help services;
- other educational settings;
- other agencies involved in safeguarding a child.

Information will only be shared where it is necessary, proportionate and in the best interests of the child, in accordance with statutory guidance and data protection legislation.

12.5 Transfer of Child Protection Files

Where a pupil leaves Prior Park Paragon, the DSL will ensure that their safeguarding and child protection records are transferred securely and separately from the main pupil file.

Transfer will take place:

- within **5 working days** for an in-year transfer; or
- within the **first 5 days of a new term** where a child is moving schools at a standard transition point.

Receipt of records will be obtained from the receiving school or college.

Where safeguarding concerns are significant, complex or currently active, the DSL will also liaise directly with the receiving school's DSL to ensure that appropriate safeguarding arrangements can be put in place without delay.

13. Training

13.1 Safeguarding Training for Staff, Trustees and Volunteers

Prior Park Paragon is committed to ensuring that all staff, Trustees and volunteers receive appropriate safeguarding and child protection training in accordance with **Keeping Children Safe in Education (KCSIE) 2026**, local safeguarding partnership procedures and the Statutory Framework for the Early Years Foundation Stage. Training promotes a culture of vigilance, professional curiosity and shared responsibility, encouraging all members of the school community to maintain an attitude of *"it could happen here"* and to act at all times in the best interests of the child.

All new staff, Trustees and volunteers will receive safeguarding and child protection training as part of their induction.

This will ensure that they understand:

- this Safeguarding and Child Protection Policy and associated safeguarding policies;
- the role and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy DSLs;
- the identity of the Nominated Safeguarding Trustees;
- safeguarding procedures, including how to record concerns and make referrals;
- early help processes and local safeguarding arrangements;
- the School's safeguarding response to children who are absent from education for prolonged periods and/or repeated occasions;
- whistleblowing procedures;
- the applicable Code of Conduct;
- online safety, acceptable use of technology, filtering and monitoring arrangements;
- child-on-child abuse, low-level concerns and Prevent responsibilities; and

- the importance of professional curiosity and recognising that safeguarding concerns can arise in any setting.

As part of the School's safeguarding arrangements:

- All staff, regardless of role, will read Part One of Keeping Children Safe in Education (KCSIE) 2026 and will be required to re-read it annually and whenever significant updates are issued by the Department for Education.
- Trustees, the Senior Leadership Team, the DSL team and relevant Human Resources staff will read KCSIE 2026 in its entirety.
- Volunteers will receive safeguarding information and training appropriate to their role and level of contact with children.

All staff will confirm annually that they have read and understood the relevant safeguarding policies and statutory guidance. In addition, staff will demonstrate their understanding of *Keeping Children Safe in Education* (KCSIE) by completing a short safeguarding assessment. This will cover any significant changes to statutory guidance, the School's safeguarding procedures, and the responsibilities of all staff in safeguarding and promoting the welfare of children.

Copies of safeguarding policies and guidance are available through the staff portal and are updated whenever changes are made.

All staff, Trustees and volunteers involved in regulated activity will undertake safeguarding and child protection training, which will be updated regularly and at least annually. Safeguarding training will:

- form part of the School's whole-school safeguarding approach;
- be informed by advice from Bath and North East Somerset safeguarding partners;
- include online safety and digital safeguarding;
- include expectations, roles and responsibilities relating to filtering and monitoring;
- address emerging safeguarding risks, including those associated with artificial intelligence (AI);
- support staff in recognising abuse, neglect, exploitation and vulnerability;
- include Prevent awareness training;
- reinforce the Teachers' Standards and the responsibility to create a safe environment for all pupils.

Safeguarding updates will be provided throughout the year through staff meetings, CPD sessions, National College training, safeguarding briefings, emails and other appropriate communication from the DSL team.

Contractors working regularly within the School and volunteers involved in regulated activity will receive safeguarding information and training appropriate to their role.

13.2 Training for the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads

The DSL and Deputy DSLs will undertake safeguarding and child protection training appropriate to their role and responsibilities.

This training will:

- be completed in accordance with B&NES safeguarding partnership requirements;
- provide the knowledge and skills necessary to carry out their safeguarding responsibilities effectively;
- include multi-agency safeguarding training;
- include Prevent training and awareness of radicalisation and extremist ideologies;

- be refreshed in accordance with local safeguarding partnership requirements and at least every two years.

In addition, the DSL and Deputy DSLs will update their safeguarding knowledge and skills regularly and at least annually through:

- attendance at safeguarding networks and update sessions;
- local authority and safeguarding partnership briefings;
- specialist safeguarding training;
- professional reading and review of safeguarding developments;
- engagement with local and national safeguarding guidance.

The DSL team will ensure that safeguarding training remains responsive to emerging issues including:

- mental health;
- child-on-child abuse;
- online safety and artificial intelligence;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE);
- county lines;
- sexual violence and sexual harassment;
- radicalisation and extremism;
- female genital mutilation (FGM);
- children missing education;
- safeguarding children with SEND.

Additional specialist training will be completed by staff with responsibility for looked-after and previously looked-after children, mental health, Prevent and other safeguarding leadership roles where required.

13.3 Training for Trustees

All Trustees receive safeguarding and child protection training, including online safety, on appointment and at regular intervals thereafter.

This training enables Trustees to:

- understand their statutory safeguarding responsibilities;
- provide appropriate challenge and oversight;
- assure themselves that safeguarding arrangements are effective;
- understand safeguarding risks and emerging issues;
- contribute to the School's whole-school safeguarding approach.

All Trustees who may be involved in managing allegations against the Head will receive appropriate training and support.

13.4 Safer Recruitment Training

At least one member of every recruitment panel will have completed appropriate safer recruitment training.

Safer recruitment training will be in line with the requirements of Keeping Children Safe in Education and local safeguarding procedures.

Further information regarding safer recruitment arrangements can be found in this policy and complete and full arrangements found in Prior Park Schools Safer Recruitment Policy.

13.5 Supervision and Support

The School recognises that safeguarding can be demanding and that staff require appropriate support.

Staff who work directly with children and families, in a safeguarding capacity, will receive appropriate supervision, support, coaching and guidance to enable them to fulfil their safeguarding responsibilities and discuss sensitive safeguarding matters where necessary.

Within the EYFS, the School will ensure that staffing, qualifications, supervision and safeguarding arrangements comply with the requirements of the Statutory Framework for the Early Years Foundation Stage.

14. Staff recruitment

The School is committed to safer recruitment processes.

All members of staff, including teaching and non-teaching staff, Trustees, volunteers, part-time staff, temporary and supply staff, contractors and visiting staff, are subject to the safeguarding and recruitment checks required under the Education (Independent School Standards) Regulations and in accordance with the latest version of *Keeping Children Safe in Education (KCSIE)*.

Appropriate pre-employment checks will be completed before an individual commences work at the School in accordance with KCSIE, the Independent School Standards and, where applicable, the Statutory Framework for the Early Years Foundation Stage. Prior Park Paragon fully understands the importance of these pre-employment checks in identifying whether a person may be unsuitable to work with children, and will ensure that until all of the checks have been satisfactory completed, then the person will not be eligible to start their role. These checks are part of Prior Park Schools safeguarding regime and will continue following appointment where necessary.

For appointments within the EYFS, staff will not commence work until an enhanced DBS certificate has been received and reviewed by the School.

All staff who work with children under the age of 5, including our reception class, and also any staff working in wraparound care for children up to the age of 8, e.g. breakfast clubs or after school care, will be asked to complete an annual disqualification from childcare check.

At least two satisfactory references will be obtained and scrutinised before interview wherever possible, including verification of employment history and any discrepancies.

Where applicants have lived or worked overseas, the School will carry out additional checks as required by KCSIE 2026, including obtaining criminal record information or equivalent certificates of good conduct where available.

For any staff member taking up a management position, then an additional Section 128 check will be conducted to ensure that the person is not subject to a section 128 direction made by the Secretary of State. For further information see: [The Independent Educational Provision in England \(Prohibition on Participation in Management\) Regulations 2014](#)

Any exceptional arrangements relating to appointments elsewhere in the School will be managed in accordance with KCSIE, safer recruitment requirements and the Prior Park Schools Safer Recruitment Policy.

Anyone undertaking regulated activity within the school (including volunteers), whether they are supervised or not, will require an enhanced DBS with barred list check. For a full definition of what constitutes regulated activity, refer to appendix 8.

Shortlisted candidates will be informed that online searches will be undertaken as part of the School's due diligence and safeguarding responsibilities.

The School maintains a Single Central Record (SCR) in accordance with statutory requirements. The SCR records all relevant safeguarding and recruitment checks, including any standalone children's barred list checks where required. The SCR is reviewed at least termly by the DSL, HOC, COO and Trustees to ensure compliance and suitable checks for all employees.

At least one member of every recruitment panel will have completed appropriate Safer Recruitment training.

To ensure staff remain suitable for their role, Prior Park School staff have an ongoing duty to disclose any change in circumstances that may affect their suitability to work with children, including cautions, convictions, police investigations, professional sanctions or relevant matters affecting childcare disqualification.

Further information can be found in the Prior Park Schools *Safer Recruitment Policy*.

Organisations or individuals using the school premises

Prior Park Paragon may receive an allegation relating to an incident that happened when an individual or organisation was using the 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, Prior Park Paragon will follow their safeguarding policies and procedures, including informing the LADO.

Additionally, as far as possibly, Prior Park Paragon will ensure that the individual or organisation bases their safeguarding policy and procedures on the guidance set out in KCSIE and have suitable safeguarding procedures in place.

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

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

Prior Park Paragon recognises that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Through rigorous monitoring of absences, the school's response to persistently absent children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first

emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

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

Prior Park Paragon ensures that it adheres to the statutory guidance set out in 'working together to safeguard attendance'. For more information, see the Attendance Policy.

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

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

- The CMEO must be notified of all decisions.
- If the child is already known to B&NES Children's Services, their allocated social worker should be notified immediately
- If the child is not known to B&NES Children's Services, but the school has concerns about their welfare, the designated safeguarding lead should make a referral to B&NES Children's Services.
- If the child has an EHCP, the local authority will need to be informed so they can review the plan, working closely with parents and carers.

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

Behaviour management, positive handling and restrictive interventions

Prior Park Paragon has a Positive Behaviour Policy which all staff are expected to follow. The School's approach is rooted in positive noticing and relational practice, recognising the importance of strong, trusting relationships in promoting children's wellbeing, behaviour and safety. Staff work proactively to understand the needs of individual pupils, support emotional regulation and create a culture in which children feel safe, valued and able to flourish.

There are limited circumstances when it is appropriate for staff in schools to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances.

For more information refer to The Schools Positive Handling Policy, inc Restrictive Interventions as well as the DfE guidance: [Use of reasonable force and other restrictive interventions guidance](#)

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

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

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

- [Behaviour and discipline in schools](#) - Publications - GOV.UK
- [B&NES policy on physical intervention and restraint](#)

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.

15. 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 adhere the processes set out in it.

Staff in Pre-Prep or EYFS must follow the guidance in Appendix 1 of this policy relating to taking images of Pre-Prep and EYFS pupil and also refer to the EYFS Statutory Framework

16. Safeguarding considerations for specialist setting within the school

The School has some specialist settings such as the learning support room where 1:1 lessons are held and individual music rooms used for peripatetic lessons. Staff are given guidance detailing the additional measures taken to safeguard themselves during 1:1 or offsite tuition and performances away from the School. This information can be found in the *Staff Code of Conduct Policy*.

17. Monitoring arrangements

Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and included in a report to the Trustees. Where an incident involves a member of staff, the LADO will be asked to assist in this review, to determine whether any improvements can be made to the School's procedures. The DSL will monitor the content and operation of this policy and present an annual report to the Prior Park Schools Board of Trustees.

The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a termly report to the 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 KCSIE, EYFS Statutory Framework and the ISI Safeguarding Policy checklist as an aid, alongside any additional statutory guidance.

Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

18. Links with other 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
- Positive Behaviour Policy
- Exclusions Policy
- Online Safety Policy
- IT acceptable Use Policy
- Raising a Concern at Work 'Whistleblowing' Policy
- Student Supervision Policy
- Missing Child Procedure
- Mental Health and Wellbeing Policy
- Prevent Duty Policy
- Mobile Phone Policy
- Relationships and Sex Education Policy
- Child-on-Child Abuse Policy
- Low-Level Concerns Policy
- Visiting Speaker Policy
- Registration and Attendance Policy
- Visitors and Contractors Access and Supervision Policy
- Positive Handling Policy including the Use of Restraint
- Safety and Supervision on School Journeys Policy
- Visitors and Overnight Guests in Boarding Accommodation
- Taking, Using and Storing Student Images Policy
- Social Media Policy
- Intimate Care Policy

Appendix 1 - Early Years specific Safeguarding considerations:

All elements of this Policy apply to EYFS department at Prior Park Paragon.

Sarah James is the DSL for the EYFS

EYFS staff training ensures understanding of policy and procedure and up-to-date knowledge. Training includes awareness of:

- Significant changes in children's behaviour
- Deterioration in children's general well-being
- Unexplained bruising, marks, or indications of neglect
- Inappropriate behaviour, by child, parent/carer or staff

See section in main policy for full staff training details, including update training.

The School takes all reasonable steps to ensure that children are cared for in a secure environment. Visitors to the EYFS must follow the School's visitor procedures, sign in on arrival and be appropriately supervised where required.

Reporting concerns

Prior Park Paragon is aware of its duty to notify Ofsted of any significant safeguarding event, allegation, disqualification, serious accident, injury or death, or any other matter that must be reported under the EYFS Statutory Framework. Staff must immediately report such concerns to the DSL and Head.

If any member of staff has concerns about the safeguarding provision within the setting, then they should follow PPS Whistleblowing Policy and raise their concern.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, they should use the other channels open to them:

- NSPCC whistleblowing advice line is available. Staff can call 0800 0280285 – 08:00 to 20:00, Monday to Friday and 09:00 to 18:00 at weekends. The email address is: help@nspcc.org.uk. Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.
- Ofsted provides guidance on how to make complaints about a provider: Complaints procedure - Ofsted - GOV.UK (www.gov.uk).
- General guidance on whistleblowing can be found via: Whistleblowing for employees.

Suitable staff

The Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018 place separate and additional requirements on the EYFS department of Prior Park Paragon.

Staff who work in Early Years provision (or childcare provision), those who work in later years provision for children who have not attained the age of 8 (including during outside school hours such as breakfast clubs or after school care) and staff who are directly concerned in the management of such provision even though they may not work in the Early Years or relevant later years provision themselves, are required to declare if they are "disqualified" from doing such work.

Prior Park Paragon makes it clear to staff and prospective staff that they must disclose any information which may affect their suitability to work with children, by completing an annual disqualification from childcare declaration form. By completing the relevant information, Prior Park Schools can be assured that staff, including volunteers, have not been convicted of, cautioned for, subject to a court order,

bound over, received a reprimand or warning or been found guilty of committing any offence involving violence, sexual offences or offences against a child in the UK or abroad (whether received before or during their employment at the setting).

Staff are under an ongoing duty to inform the School of any matter which may affect their suitability to work with children, including that of anyone they currently live with. Any concerns regarding a member of staff's suitability will be assessed promptly and appropriate action taken in accordance with safeguarding, safer recruitment and employment procedures. For more information refer to PPS Safer Recruitment Policy.

Prior Park Paragon will not allow individuals to begin working or volunteering at the school until the applicant's enhanced criminal records and barred list check have been received and verified. The school will not allow anyone whose suitability has not been checked, including through a criminal records and barred list check, to have unsupervised contact with children being cared for.

Prior Park Paragon will obtain an enhanced criminal records check and barred list check for every person aged 16 and over, including volunteers, who:

- Works directly with children.
- Lives on the premises on which the childcare is provided (unless there is no access to the part of the premises when and where children are cared for) and/or
- Works on the premises on which the childcare is provided (unless they do not work on the part of the premises where the childcare takes place, or do not work there at times when children are present).

For full details of pre-employment checks, refer to PPC Safer Recruitment Policy.

The School will ensure that paediatric first aid requirements are met in accordance with the EYFS Statutory Framework. At least one person who holds a current and full paediatric first aid certificate will be available at all times when children are present and will accompany children on educational visits.

Every child within the EYFS is assigned a key person in accordance with the EYFS Statutory Framework. The key person helps ensure that each child's individual needs are met and supports the child in becoming familiar with the setting, building relationships with parents and carers and helping the child feel safe and secure.

Staff-to-child ratios

Staff-to-child ratios within the EYFS are calculated in accordance with the requirements of the EYFS Statutory Framework. When determining ratios, the School takes account of the age of the children, the qualifications of staff, paediatric first aid (PFA) requirements and the individual needs of the children in their care. This ensures that staffing arrangements meet the needs of all children, promote their welfare and maintain their safety at all times.

Ratios are based on the number of staff who are deployed and available to work directly with children rather than solely on class structures or staffing allocations. Staff undertaking other duties cannot be counted within ratios unless they remain available to meet the needs of children and fulfil supervision requirements.

The School will ensure that children are adequately supervised at all times, including during mealtimes and other routine care activities.

In the case of workers that are supplied by an agency or third party organisation, Prior Park Paragon will ensure that the agency or organisation has carried out the relevant checks, including the Disqualification from Childcare check.

The grounds for disqualification are, in summary, that:

- a. A person is barred from working with children;
- b. they have been cautioned for, subjected to a court order for, convicted of or charged with violence, sexual criminal offences or offences against children and adults, at home or abroad;
- c. other orders, cautions, bound overs, reprimands or warning have been made against them relating to their care of children;
- d. they have had their registration refused or cancelled in relation to childcare or children's homes or have been disqualified from private fostering.
- e. Schools may not employ people who are "disqualified" to work in these settings or allow them to be directly concerned with their management.
- f. Disqualification occurs as soon as the criteria in 7.5.3 are met (even before formal sanction is issued). Employees should inform the school of their disqualification immediately.
- g. Relevant convictions are not considered "spent" in this connection. The relevant offences are listed in Ofsted: Disqualifications (February 2013) and in DBS: Relevant Offences (September 2014).
- h. Existing employees working in the Early Years and later years provision and those who are directly concerned in the management of such provision should provide the relevant information about themselves.
- i. New employees working in the relevant settings and those concerned with the management of the relevant settings will be required to provide such declaration as part of the Prior Park Schools pre-employment checks.

Attendance within the EYFS

In line with the rest of Prior Park Paragon, all pupils within our EYFS are registered, at the start of each session, securely using iSAMS.

Any absences are followed up on that day if a child is absent and the code in the register will indicate the reason for the child's absence.

If a child is absent for a prolonged period of time, or if a child is absent without notification from the parent and/or carer, attempts must be made to contact the child's parents and/or carers and alternative emergency contacts. Providers must consider patterns and trends in a child's absences and their personal circumstances and use their professional judgement when deciding if the child's absence should be considered as prolonged. Consideration must be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns must be referred to local children's social care services and/or a police welfare check requested.

The School has clear procedures for responding to a missing child or an uncollected child. All staff working within the EYFS are familiar with these procedures and understand their responsibilities in ensuring the safety and welfare of children. Full details can be found in the School's Missing Child Procedure and Attendance Policy.

Control of images and use of mobile devices.

In Pre-Prep and the EYFS, all staff and support staff's mobile phones must be left, turned off, in a cupboard: staff must never use their own phones, cameras or other mobile devices to take images of children.

Any photos of children will be taken using a Prior Park Schools issued device and never on a staff members personal device.

Photographs and recordings (video and audio) will only be taken of students where there is a legitimate reason to do so, or with their parents' permission (provided in writing via the Use of Images Consent Form) if being used for wider publicising e.g. marketing purposes (as detailed above).

Photos cannot be used or passed on outside of the school.

Providing intimate or personal care to pupils

Staff at Prior Park Paragon may need to provide intimate or personal care to younger pupils, for example helping a child who has soiled themselves or supervising pupils who are changing for P.E. Children should be encouraged to carry out self-care tasks for themselves where appropriate, but where adult intervention is needed, the following should be observed:

- Staff should follow Prior Park Paragon Intimate Care policy when providing intimate or personal care
- When taking pupils to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen
- Parents should always be notified if intimate care has been provided
- When providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the DSL.
- When children are changing, levels of supervision should be appropriate to the pupil's age
- Staff should avoid any physical contact unless a child needs help
- Staff should ensure that changing areas are private and that others are not able to enter whilst children are changing.

Acceptable Comforting

If a child requires comforting (following an accident, or on parents departure from the setting) and if in the short term, physical contact will help, it will be given when in the best interests of the child. This will mainly involve children in the EYFS, however due to development and specific needs may also include older children. Possible examples may include:

- Short cuddles, at their level, or sitting on an adult's knee. Sitting a child on an adult's knee is often a way of giving comfort or calming a child, this will be done on the child's request or with their consent. Staff are aware of the need to position children in a side saddle and to ensure they are never on their own with a child.
- When separating a child from a parent /carer if it is necessary to physically remove/transfer the child to a member of staff, with adult's consent, and to comfort them afterwards.
- If a child is upset due to any reason that causes them significant distress and they have requested or would benefit from physical contact such as a hug. This will be done at their request (this could be a physical gesture such as them putting out their arms) or with their consent.
- When a child instigates a hug because they are happy to see you. Staff are aware of the need to hug 'openly' and to end the hug after only a brief moment of contact.

Occasionally there is no alternative to picking a child up e.g. for Health & Safety reasons, but this is considered carefully in any given instance.

There are times when contact is not appropriate, often instigated by the children themselves, and we will explain when not appropriate. This includes any form of kissing on cheek, forehead or lips.

Appendix 2: School premises, security and visitors

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

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

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

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

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

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

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

Visitors in a professional capacity

For visitors in a professional capacity the school will check ID on arrival. Prior to arrival, the school will seek assurances that the visitor has had the appropriate DBS check depending on the activity they are there to carry out (or that the visitor's employers have confirmed that their staff have appropriate checks. If this has been assured, then the school should not have the need to ask to see their DBS certificate).

Where a visitor will have no contact with children, it is unlikely that a DBS check will be required.

Dogs on site

Dogs should not be brought onto the School site, during either term time or holiday periods, without the permission of the COO.

Prior Park Paragon has a qualified therapy dog who is on site throughout the week. The dog, Oreo, has undergone extensive training and has been assessed to be a qualified therapy dog by an accredited organisation. Copies of the relevant certificates and insurances are held by the school.

Parents who bring their dogs during drop off and pick up times are reminded of the need to ensure their dog is kept on a lead, is under their control at all times and that they pick up any faeces after their dog.

Staff, and parents, are informed that no dog banned under current UK legislation, including, but not limited to the XL Bully, Pit Bull Terrier, Japanese Tosa, Dogo Argentino and Fila, is to be brought onto the school site.

For more information see the PPS Dogs and Other Animals on Site Policy.

Appendix 3: The Prevent Duty, Channel and links to visiting speakers

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 and identify any individual who may be susceptible to being drawn into terrorism. This duty is known as the Prevent duty.

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

- Contextual information –working with the Local Authority, who provide contextual information about the area, the School assesses the risk of children being drawn into terrorism, including extremist ideologies
- Working in partnership –liaising closely with the BCSSP to ensure children requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify children susceptible 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 Paragon undertakes a Prevent Risk Assessment at least annually to assess the risk of pupils being drawn into terrorism, radicalisation or extremism. The assessment takes account of local, regional and national intelligence, guidance from safeguarding partners and the specific context of the School community. Relevant findings are shared with staff through safeguarding training and updates to ensure they understand local risks and are equipped to support, safeguard and protect pupils who may be vulnerable to radicalisation.

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

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. Whilst the referral is being assessed, should any further or new information come to light, this should also be passed to police. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse, 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.

Statutory guidance on Channel is available at: <https://www.gov.uk/government/publications/channel-guidance> and <https://www.support-people-vulnerable-to-radicalisation.service.gov.uk/portal#channel-or-prevent-multi-agency-panel-pmap-course> .

Visiting speakers

Prior Park Paragon 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 Paragon'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 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. They may also conduct research on the Visiting Speaker and/or their organisation, as appropriate. We will not use a Visiting Speaker where any link is found to extremism, such as extremist groups and movements.

A member of school staff will be present during the visit/talk, who will monitor what is being said to ensure that it aligns with the values and ethos of the school and British values. In the unlikely event that the talk/presentation does not meet this requirement, Visiting Speakers will be informed that school staff have the right and responsibility to interrupt and/or stop a presentation. The member of staff will report this to the Deputy Head Pastoral 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 Paragon's *Reception and Visitors Policy* for further information

Appendix 4: How to react to signs of 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.

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 displays behaviours or language which is not in line with normal development for their age
- 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

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

Listening to children and record keeping

The School provides a range of opportunities for children to be listened to. Children can speak with their class teachers, their Teaching Assistants, our school nurse, a member of the Pastoral team or make use of the School counselling service. Contact details for external agencies such as Childline and NSPCC are available on the 'Keeping you safe' posters which are prominently on display throughout the School – along with photos of who the children can talk to on the safeguarding/pastoral team.

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

- 'Victim' is a widely understood and recognised term, but not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. You should be prepared to use any term the child feels most comfortable with when managing an incident
- 'Alleged perpetrator(s)' and 'perpetrator(s)' are widely used and recognised terms, but you should think carefully about what terminology you use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too. You should decide what's appropriate and which terms to use on a case-by-case basis.

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, follow T.E.D (tell, explain, describe) 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.

Staff must record 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 (which will be automatically recorded by CPOMs)
- 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).

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

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.

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

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

- Where a pupil makes a disclosure of FGM, the school will follow the mandatory reporting rules and make appropriate referrals to the police. As set out in the following documentation: [FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf](#) ([publishing.service.gov.uk](#))
- All concerns around FGM, including any disclosure made by a pupil, will be discussed with the DSL before any action is taken.

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.

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

Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken. See section 16 of this policy for further information of how to do this and links to BCSSP reporting.

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

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

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

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

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.

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.

Making a referral to children's social services

When a child is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to the Local Authority Children's Social Care. Parental consent for referrals of this type is not required in these

circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

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

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

Referral should be made online [HERE](#)

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

Where there is any doubt about whether the concerns raised meet the threshold for a child protection referral, the DSL, or staff member, 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.

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.

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

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

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. [BCSSP Escalation Procedure](#)

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 [when-to-call-the-police--guidance-for-schools-and-colleges.pdf](#) (npcc.police.uk) The School is not required to obtain parental consent prior to a referral being made.

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

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.

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.

Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. Referrals to the Channel panel requires the consent of the person receiving support. The School will respond to requests for information from the police promptly, and in any event within five to ten working days (see the School's Prevent Policy).

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 the local authority's 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.

Attendance at case conference and core groups

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

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

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

Monitoring

Where a pupil 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 DSL 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 pupil's CPOMS file and copies made available to all conferences and core group meetings
- the DSL will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing and will report to other Council staff as required.

Informing parents

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

For Channel referrals, the DSL will seek 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.

At the point of referral to local authority children's social care, 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 local authority children's social care.

This information is based on the Department for Education's statutory guidance, Keeping Children Safe in Education (KCSIE) 2026.

Appendix 5: types of abuse

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 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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Verbal abuse such as criticism, belittling, or name-calling

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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
- 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.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 6: Allegations about members of staff, supply staff, contractors and volunteers

Guidance to Staff

Prior Park Paragon is committed to safeguarding and promoting the welfare of children and expects all staff, volunteers, contractors and Trustees to share this commitment.

To minimise the risk of allegations, all adults working within the School are expected to follow the Prior Park Schools Staff Code of Conduct and maintain appropriate professional boundaries at all times. Particular care should be taken when working with children on a one-to-one basis.

The School recognises that any concern about the behaviour of an adult working with children must be taken seriously and managed appropriately. All concerns will be dealt with in accordance with:

- Keeping Children Safe in Education (KCSIE) 2026;
- relevant safeguarding legislation;
- Bath and North East Somerset safeguarding procedures;
- South West Child Protection Procedures; and
- Local Authority Designated Officer (LADO) guidance.

All staff should be aware of their responsibility to report concerns about the conduct of adults working with children. This includes concerns relating to staff, volunteers, Trustees, supply staff, contractors or any other adult working on behalf of the School.

The Head is the School's designated representative for managing allegations against staff and will act as the main point of contact with the Local Authority Designated Officer (LADO). A deputy representative will be identified to act in their absence or where allegations concern the Head.

All allegations relating to staff members will be referred to the Head. Allegations concerning the Head will be referred directly to the Chair of Trustees.

Allegations that Meet the Harm Threshold

This section applies where it is alleged that any person working with children on behalf of the School 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 they 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.

These criteria are often referred to as the **harm threshold**.

The School recognises that behaviour occurring both inside and outside of the workplace may raise concerns about an individual's suitability to work with children.

Examples may include:

- inappropriate relationships with children;
- sexual offences involving children;
- grooming behaviour;

- inappropriate online communication with children;
- possession of indecent images of children;
- domestic abuse or other behaviour which may indicate a risk to children.

Reporting an Allegation

Any allegation or safeguarding concern relating to an adult working with children must be reported immediately.

The adult to whom the allegation relates should not be informed unless and until this has been agreed with the LADO and any other relevant agencies.

Reports should be made as follows:

- allegations concerning staff, volunteers, contractors, supply staff or the DSL should be reported to the Head;
- allegations concerning the Head should be reported directly to the Chair of Trustees;
- allegations concerning a Trustee should be reported to the Chair of Trustees;
- allegations concerning the Chair of Trustees should be reported to the Safeguarding Trustee.

The individual responsible for managing the allegation is referred to throughout these procedures as the **Case Manager**.

Any allegation concerning a Trustee will be managed in accordance with KCSIE 2026 and advice from the LADO.

If the School receives an allegation relating to an individual or organisation using School premises to provide activities for children, the School will follow the same safeguarding procedures and consult the LADO as appropriate.

Action to be Taken by the Case Manager

Before contacting the LADO, the Case Manager will undertake basic enquiries in accordance with the South West Child Protection Procedures to establish the facts and determine whether there is any foundation to the allegation. No action will be taken that could compromise a future police or statutory investigation.

Where there is uncertainty as to whether an allegation meets the harm threshold, the Case Manager will seek advice from the LADO.

Where an allegation meets the criteria outlined above:

- the Case Manager will refer the matter to the LADO immediately and, in any event, within one working day;
- no formal internal investigation will be undertaken before consultation with the LADO;
- all discussions and decisions will be recorded in writing;
- where appropriate, the LADO will advise on whether Children's Social Care and/or the Police should be involved.

Disclosure of Information

The Case Manager will inform the individual who is the subject of the allegation as soon as possible following consultation with the LADO and, where applicable, Children's Social Care and the Police.

Parents/carers of the child involved will usually be informed as soon as possible, subject to advice received from the LADO, Children's Social Care and/or the Police.

The School will:

- keep parents informed regarding the progress of the case as it affects their child;
- ensure information sharing remains proportionate and lawful;
- comply with data protection and confidentiality requirements; and
- share information only with those who need to know.

Investigation

Investigations may be undertaken by:

- the School;
- Children's Social Care;
- the Police; or
- another appropriate external agency.

Where an external agency is leading an investigation, Prior Park Paragon will cooperate fully and will not normally commence disciplinary proceedings until external investigations have concluded.

The following definitions, as set out in KCSIE 2026, will be used:

- **Substantiated** – there is sufficient evidence to prove the allegation.
- **Malicious** – there is sufficient evidence to disprove the allegation and evidence of a deliberate attempt to deceive or cause harm.
- **False** – there is sufficient evidence to disprove the allegation.
- **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation.
- **Unfounded** – there is no evidence or proper basis which supports the allegation.

Support

Prior Park Paragon recognises its duty of care to all individuals involved in safeguarding investigations.

Appropriate support will be provided to:

- the member of staff, volunteer or contractor subject to the allegation;
- the child or children involved; and
- parents/carers where appropriate.

Suspension

Suspension will not be an automatic response to an allegation.

Prior Park Paragon will consider suspension only where:

- there is cause to suspect that a child is at risk of significant harm;
- the allegation is sufficiently serious that dismissal may result; or
- there is no reasonable alternative to suspension.

The rationale for any suspension decision will be documented and discussed with the LADO.

Confidentiality and Information Sharing

The School will make every effort to maintain confidentiality during and after investigations.

Information will only be shared on a need-to-know basis and in accordance with:

- KCSIE 2026;
- Working Together to Safeguard Children;
- the Data Protection Act 2018;
- UK GDPR; and
- Prior Park Schools data protection procedures.

The School recognises that it is a criminal offence to publish information that may identify a teacher who is the subject of an allegation before they are formally charged, except in circumstances permitted by law.

Unsubstantiated, Unfounded, False or Malicious Allegations

Where an allegation is determined to be unsubstantiated, unfounded, false or malicious, the Case Manager will consider whether:

- the child requires additional support;
- a referral to Children's Social Care is appropriate;
- additional pastoral support is required; or
- disciplinary action should be taken, where appropriate and proportionate.

Substantiated Allegations

Where an allegation is substantiated and the individual is dismissed, resigns or ceases to provide services because they are considered unsuitable to work with children, the School will make a referral to the Disclosure and Barring Service (DBS) as required. This duty applies equally to paid staff and volunteers where they were engaged in regulated activity. Where a volunteer, or staff member, has ceased to work at the school, a referral will still be made if it meets the requirements.

Further information, including the information the school must provide to meet the referral duty, can be found here: [DBS barring referral guidance - GOV.UK](#)

Where appropriate, referrals will also be made to:

- the Teaching Regulation Agency (TRA); and/or
- any relevant professional regulatory body.

Details of how to refer to the TRA can be found here: [Report serious teacher misconduct - GOV.UK](#)

At the conclusion of substantiated cases, the School will review whether any lessons can be learned and whether improvements should be made to safeguarding practice, policy, training or procedures.

Charity Commission Reporting

As a registered charity, Prior Park Schools will report safeguarding-related serious incidents to the Charity Commission where required by law and Charity Commission guidance. Responsibility for making such reports rests with the COO and Board of Trustees.

Record Keeping and References

The School will maintain records relating to allegations in accordance with KCSIE 2026, employment legislation and data protection requirements.

Where allegations are found to be malicious or false, records will be removed from personnel files unless there is a lawful reason to retain them.

For all other allegations, the School will retain:

- a summary of the allegation;
- details of how it was investigated;
- decisions reached;
- actions taken; and
- outcomes.

When providing references, the School will not refer to allegations that were found to be false, malicious, unfounded or unsubstantiated.

Low-Level Concerns

Low-Level Concerns Culture

Prior Park Paragon promotes a culture of openness, transparency and vigilance in which concerns about the conduct of adults working with children can be raised, discussed and addressed appropriately.

A low-level concern is any concern, no matter how small, including one which causes a sense of unease or a nagging doubt, that an adult working in or on behalf of the School may have acted in a way which:

- is inconsistent with the Staff Code of Conduct, including conduct outside work; and
- does not meet the harm threshold outlined above.

The term "low-level" does not mean that the behaviour is insignificant. Rather, it means that the behaviour does not meet the threshold for referral to the LADO.

Low-level concerns may arise from observations, disclosures, complaints, self-reporting or information received from another source.

Examples include, but are not limited to:

- being overly familiar with children;
- showing favouritism;
- using a personal device to photograph pupils;
- inappropriate communication;
- inappropriate social media activity;
- using humiliating, intimidating or offensive language;
- conduct that does not meet the expectations of the Staff Code of Conduct.

Staff are encouraged to report concerns without delay and do not need to decide whether the concern meets the low-level concern threshold or the harm threshold.

Reporting Low-Level Concerns

All staff are expected to report low-level concerns promptly using the School's Low-Level Concern reporting process.

Concerns should normally be reported to the Head and DSL via the online Low-Level Concern Form. Concerns regarding the Head should be reported directly to the Chair of Trustees.

Where there is a conflict of interest, concerns may be reported directly to the Chair of Trustees or the LADO.

Agency Staff and Contractors

Low-level concerns relating to agency staff, contractors or other adults working on behalf of the School will be shared with the individual's employer where appropriate.

Consultation with the LADO

Where there is uncertainty regarding whether a concern meets the harm threshold, or there is a pattern of concerns being raised, the Head and/or DSL will seek advice from the LADO.

Self-Reporting

Staff are encouraged to self-report any conduct or incident that may be perceived as inconsistent with the Staff Code of Conduct or that could give rise to misunderstanding.

Staff are encouraged to self-report any incident that may be misinterpreted or viewed by others as inconsistent with the Staff Code of Conduct, even where no complaint has been made.

Self-reporting supports transparency, protects both staff and children, and promotes a strong safeguarding culture.

Record Keeping

All low-level concerns, including those found to be unfounded, will be recorded.

Records will include:

- details of the concern;
- the context in which it arose;
- actions taken;
- decisions made; and
- outcomes.

Records will be stored securely and confidentially in accordance with the Data Protection Act 2018, UK GDPR and School retention procedures.

References

Low-level concerns that do not result in substantiated findings will not normally be referred to in employment references.

Monitoring and Review

The Head, DSL, Head of Compliance and Head of HR will review low-level concerns at least termly. Reviews of low-level concerns form part of the School's wider safeguarding culture and help identify trends, themes, training needs, policy development and opportunities to strengthen safeguarding practice.

Reporting to Trustees

Low-level concern themes, trends and actions taken will be reported to Trustees termly in an anonymised format to enable effective safeguarding oversight.

Related Policies

Further guidance can be found in:

- PPS Low-Level Concerns Policy;
- PPS Staff Code of Conduct;
- PPS Raising a Concern at Work 'Whistleblowing' Policy.

Appendix 7: specific safeguarding issues

a. Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

b. Children who are absent from education

A child being absent from education for prolonged periods and/or on repeat occasions can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk of becoming missing from education. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

If a pupil, within the main school or EYFS, is absent for a prolonged period of time, or if a child is absent without notification from the parent or carer, attempts will be made to contact the child's parents and/or carers and alternative emergency contacts.

We will consider patterns and trends in a child's absences and their personal circumstances and use our professional judgement when deciding if the child's absence should be considered as prolonged.

Consideration will be given to the child's vulnerability, parent's and/or carer's vulnerability and their home life. Any concerns will be referred to local children's social care services and/or a police welfare check requested.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

c. Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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, having a physical or learning disability, or being neurodivergent, communication ability, physical strength, status, and access to economic or other resources.

The abuse can be perpetrated by adult males or females, or other children – who themselves may be experiencing exploitation. (in these cases it is important that the child perpetrator is also recognized as a victim). It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can be perpetrated by organised networks or gangs, and the victim may identify as part of this group.

The victim can be exploited even when the activity appears to be consensual. However, children may also not know that they are being exploited and it is up to the adults to identify the signs and offer support. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, this is considered child abuse and relevant safeguarding procedures must be followed as per: [Modern slavery: how to identify and support victims - GOV.UK](#)

d. Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Most sexual abuse is committed by individuals known to the victim. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

Victims are not always recognised and can be criminalised for actions they take while under coercion. The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. Most sexual abuse is committed by individuals known to the victim.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. It can include children who have been moved for the purpose of exploitation. This may constitute modern slavery.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

e. County lines

As county lines is a form of criminal exploitation, a staff member who identifies any potential victim of county lines exploitation should complete the relevant child protection and modern slavery referrals as detailed in the Modern Slavery statutory guidance (see link above).

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 any type of schools (including special schools), further and higher educational institutions, pupil 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 CCE and CSE 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 (from school or home) and are subsequently found in areas away from their home,
- have been the victim, perpetrator or alleged 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, and
- have their bank accounts used to facilitate drug dealing.

f. Child-on-child abuse (including harassment and violence)

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Child-on-child abuse is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Physical assault and harm, or the threat of harm with a weapon
- Harmful sexual behaviour (an umbrella term widely used in child protection, and which applies to behaviour occurring online, face-to-face, or both), sexual violence and sexual harassment, which may include misogyny/misandry
- 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, including those generated using AI
- Upskirting, which is a criminal offence, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of nude or semi-nude images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or if a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

g. 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 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.

h. 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 [Young witness booklet for 5 to 11 year olds - GOV.UK](#) and [Young witness booklet for 12 to 17 year olds - GOV.UK](#).

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.

i. Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children including physical, sexual, emotional abuse, and stalking) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn. Police must notify a school of a domestic abuse incident where a child is involved, has witnessed or been present, lives at (or is linked to) the address where it occurred, or where a Child Concern Notification has been issued, regardless of whether the child was there at the time. The police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This notification should reflect the 'voice of the child' (for example, statements made the child or behaviour observed). This is the procedure set out in the statutory Operation Encompass guidance for [information sharing](#).

The DSL will provide support according to the child's needs and update records about their circumstances.

j. Operation Encompass

Prior Park Paragon is part of Operation Encompass.

Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents. 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.

Forces and educational settings should have an open communication process to determine where a safeguarding referral should be made in accordance with local thresholds. If an officer makes a referral alongside issuing an Operation Encompass notification, they should tell the child's education setting.

The duty applies to all children in education from reception (typically aged 4/5) up to the age of 17, and who are enrolled in registered primary and secondary schools, including independent schools, private schools, alternative provision settings (e.g., Pupil Referral Units), as well as further education colleges or 16 to 19 academies in England or Wales. Police forces must notify the local authority if the child is electively home educated or missing from education. Forces may also make notifications to other settings, for example early years settings or further education provision for young people with SEND, although these are not covered under the duty.

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).

More information about Operation Encompass can be found at the statutory guidance for police: [Duty on police forces in England and Wales to notify education establishments of domestic abuse incidents: Operation Encompass](#)

k. 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 cyber dependent 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 - National Crime Agency, 'when-to-call-the-police--guidance-for-schools-and-colleges.pdf](#) and [The National Cyber Security Centre | National Cyber Security Centre](#)

l. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and DDSs will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care. Where children are living independently from their parent/carers (e.g. if they've been excluded from their family home), we will work with the local authority children's social care team to support them.

m. Temporary accommodation notification duty

The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions, health visiting services and general medical practices, when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living independently from their parents.

The notification will enable school staff to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes. Whilst any discussion with the local housing authority should be progressed as appropriate, this notification does not, and should not, replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm.

n. Honour or faith-based abuse (including FGM and forced marriage)

Honour or faith-based abuse encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

o. FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

p. Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmua@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

q. Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

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 of terrorism 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and the [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures please see PPS Prevent Duty Policy,

r. Harmful sexual behaviour, sexual violence and sexual harassment between children in schools

The school will respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school premises, and/or online.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 involving:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents
- Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents
- Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity, the age of consent is 16, and sexual intercourse without consent is rape.

HSB can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

HSB exists on a continuum and may escalate into sexual harassment or sexual violence. It can occur online or face-to-face (both physically and verbally) and is never acceptable. Sexual violence and sexual harassment may overlap.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay and bisexual children, or children questioning their gender are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising the intersection of misogyny/misandry and harmful sexual behaviour. It's important not to dismiss issues that may seem minor at first, such as derogatory language, as behaviours can escalate into more severe forms of child-on-child abuse

If staff have any concerns about HSB, sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

s. Serious violence

Serious violence is a continuing safeguarding concern which may involve:

- Physical assault
- Carrying, threatening with or using weapons (often in the context of peer conflict or bullying)
- Criminal exploitation

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Having been frequently absent, suspended, spent time in alternative provision, or permanently excluded from school
- Having been involved in offending, such as theft or robbery
- Being male
- Having experienced child maltreatment
- Having used drugs or alcohol in early adolescence
- Having previously been a victim or previously perpetrated violence

Staff will be aware of these indicators and risk factors and will be alert to when children might be at highest risk around the school day (for example, immediately after school).

If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, including a child carrying or using a weapon (or expressing intent to do so), they will report this to the DSL.

The DSL will:

- Assess the risk to both the individual pupil and others in the school, consider wider information or concerns and take appropriate action
- Put in place a safety and support plan for the pupil (depending on the risk)
- Where relevant, consider action to de-escalate peer conflict

t. Checking the identity and suitability of visitors

All visitors will be required to sign in at the Reception desk. If they are unknown to the school, they will be asked to provide a form of photo ID so their identity can be verified.

Visitors are expected to sign the visitors' book and wear a visitor's badge at all times

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)
- Will be asked to show their DBS certificate, which will be checked alongside their photo ID, if the above has not been completed/received

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out due diligence and appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

See also Appendix 2

u. Non-collection of children

If a child is not collected at the end of the session/day, we will:

- The Staff member to inform receptionists who will try to make contact with the child's parents to see if there has been a delay. If no answer, then a message is left, and the other parents' contact number is tried.
- If, after half an hour, no-one has arrived to collect the child, then school will try to make contact with the child's parents again.
- If, after an hour (or earlier if there is good reason for this eg, after 6pm), no contact has been made with the child's parents, then the child's emergency contacts are phoned to see if they can provide any further information about the situation.
- If, after 6pm (or sooner if there is a good reason), no-one has arrived to collect the child, or staff have been unable to contact a parents or emergency number, then Social Services will be contacted:
- Out of hours (after 5pm weekdays and 4.30pm on Friday): Emergency Duty Team on 01454 615165.
- During office hours: 01225 396111, or 01225 477929
- If the child already has a social worker, contact the social worker or team involved, or email: ChildCare_Duty@bathnes.gov.uk or phone 01225 396967
- The member of SLT will remain with the child, and keep them safe at school, until they have either been collected by a parents or social services.
- The member of staff will make a log of the incident on CPOMS in the child's safeguarding record.
- The member of staff will inform The Head and DSL immediately.

v. Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will: follow the procedures set out in Appendix 13 at the end of this policy.

Appendix 8: Regulated activity

A person will be engaging in regulated activity with children if they work on a frequent basis at Prior Park Paragon, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children. A person will also be in regulated activity if, as a result of their work or volunteering, they:

- will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Further details on regulated activity are below.

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026.

Regulated activity includes:

- a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b) any other type of paid work for a limited range of establishments (known as ‘specified places’, which include schools and colleges), with the opportunity for contact with children.

Work under (a) or (b) is regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight. Some activities are always regulated activities, regardless of frequency. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
 - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
 - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above.

The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if “it is carried out frequently by the same person” or if “the period condition is satisfied”.

Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

Appendix 9 - External Support

There is a wealth of information available to support schools and colleges. The following list is not exhaustive but should provide a useful starting point:

Abuse

Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours:
<https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/>

[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
[Forced marriage resource pack](#) - GOV.UK

Bullying

[Preventing bullying including cyberbullying](#) - DfE advice

Children missing from education, home or care

[Children missing education](#) - DfE statutory guidance
[Children who run away or go missing from home or care](#) - GOV.UK - DfE statutory guidance
[Children and adults missing strategy](#) - Home Office strategy

Children with family members in prison

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.

Child Exploitation

[Modern slavery: how to identify and support victims](#) - GOV.UK – Modern Slavery Statutory Guidance.
[Interim guidance for ICTGs](#)- Independent Child Trafficking Guardianship Service guidance
[Safeguarding children who may have been trafficked](#) - GOV.UK– DfE and Home Office guidance
[Care of unaccompanied migrant children and child victims of modern slavery](#) - GOV.UK– DfE statutory guidance
<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims> – Home Office statutory guidance
<https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit> – Home Office guidance
[Child Sexual Exploitation | The Children's Society](#)– The Children's Society and Home Office

[County Lines Toolkit For Professionals | The Children's Society](#) – The Children's Society in partnership with Victim Support and National Police Chiefs' Council

[Multi-agency Practice Principles for responding to child exploitation and extra-familial harm](#) – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

[What is county lines and child criminal exploitation? - Missing People](#) - Missing People advice
[SafeCall - Missing People](#) - SafeCall is a national free, confidential and anonymous helpline and support service for young people and family members that are affected by missing, county lines and criminal exploitation. Confidential support and webinars are also available to professionals.

[County Lines Support | Catch22](#) - A specialist support and rescue service for young people and their families who are criminally exploited through county lines. (The service currently operates from London, Merseyside, the West Midlands, West Yorkshire and Greater Manchester.)

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 - GOV.UK](#) - Home Office strategy

[Information and advice on drugs - Talk to Frank website](#)

[Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association

Honour or faith-based 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 pupils 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

Filtering and Monitoring

UK Safer Internet Centre: <https://saferinternet.org.uk/guide-andresource/teachers-and-school-staff/appropriate-filtering-and-monitoring>. The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be accessed at Filtering and monitoring webinars available – UK Safer Internet Centre.

South West Grid for Learning (swgfl.org.uk) has created a tool to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

Support for schools when considering what to buy and how to buy it is available via the: schools' buying strategy with specific advice on procurement here: [buying for schools](#).

The Department has published [Generative AI: product safety expectations to support schools to use generative artificial intelligence safely](#), and explains how filtering and monitoring requirements apply to the use of generative AI in education.

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 pupils and students

[Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely

[London Grid for Learning](#) guidance, including platform specific advice

[National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing

[UK Safer Internet Centre](#) guidance on safe remote learning

Online Safety- Support for children

[Childline](#) for free and confidential advice

[UK Safer Internet Centre](#) to report and remove harmful online content [CEOP](#) for advice on making a report about online abuse

Online safety- Parental support

[Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support

[Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents

[Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying

[Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world

[How Can I Help My Child?](#) Marie Collins Foundation – Sexual Abuse Online

[Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation

[London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

[Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

[National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online

[Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games

[Parentzone](#) provides help for parents and carers on how to keep their children safe online

[Talking to your child about online sexual harassment: A guide for parents](#) – This is the Children's Commissioner's parent guide on talking to your children about online sexual harassment

[#Ask the awkward](#) – Child Exploitation and Online Protection Centre guidance to parents to talk to their children about online relationships

Private fostering

[Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

Prevent duty guidance- Home Office guidance

Prevent duty: additional advice for schools and childcare providers - DfE advice

Educate Against Hate website - DfE and Home Office advice

Prevent for FE and Training - Education and Training Foundation (ETF)

Extremism and Radicalisation Safeguarding Resources – Resources by London Grid for Learning

Serious Violence

Serious violence strategy - Home Office Strategy

Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office

Youth Endowment Fund – Home Office

Gangs and youth violence: for schools and colleges - Home Office advice Tackling violence against women and girls strategy- Home Office strategy

Violence against women and girls: national statement of expectations for victims - Home Office guidance

Sexual violence and sexual harassment Specialist Organisations

Barnardo's - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

Lucy Faithful Foundation - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.

Marie Collins Foundation – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

NSPCC - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.

Rape Crisis - National charity and the umbrella body for their network of independent member Rape Crisis Centres.

UK Safer Internet Centre - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

Harmful sexual behaviour

Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details of local specialist sexual violence organisations.

NICE guidance contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

HSB toolkit The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework- free and independent advice about HSB.

Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self- assessment toolkit and guidance for addressing HSB in schools.

Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

Support for Victims

Anti-Bullying Alliance - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

Rape Crisis - Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.

The Survivors Trust- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.

Victim Support - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

Childline provides free and confidential advice for children and young people.

Toolkits

ask AVA - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.

NSPCC - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

NSPCC - Resources which help adults respond to children disclosing abuse.

NSPCC also provides free and independent advice about HSB: NSPCC - Harmful sexual behaviour framework

Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire - Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.

Contextual Safeguarding Network – self-assessment toolkit for schools to assess their own response to HSB.

Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities.

Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

NSPCC - Harmful sexual behaviour framework An evidence-informed framework for children and young people displaying HSB.

Contextual Safeguarding Network – Beyond Referrals - Schools levers for addressing HSB in schools.

Sharing nudes and semi-nudes

London Grid for Learning-collection of advice - Various information and resources dealing with the sharing of nudes and semi-nudes.

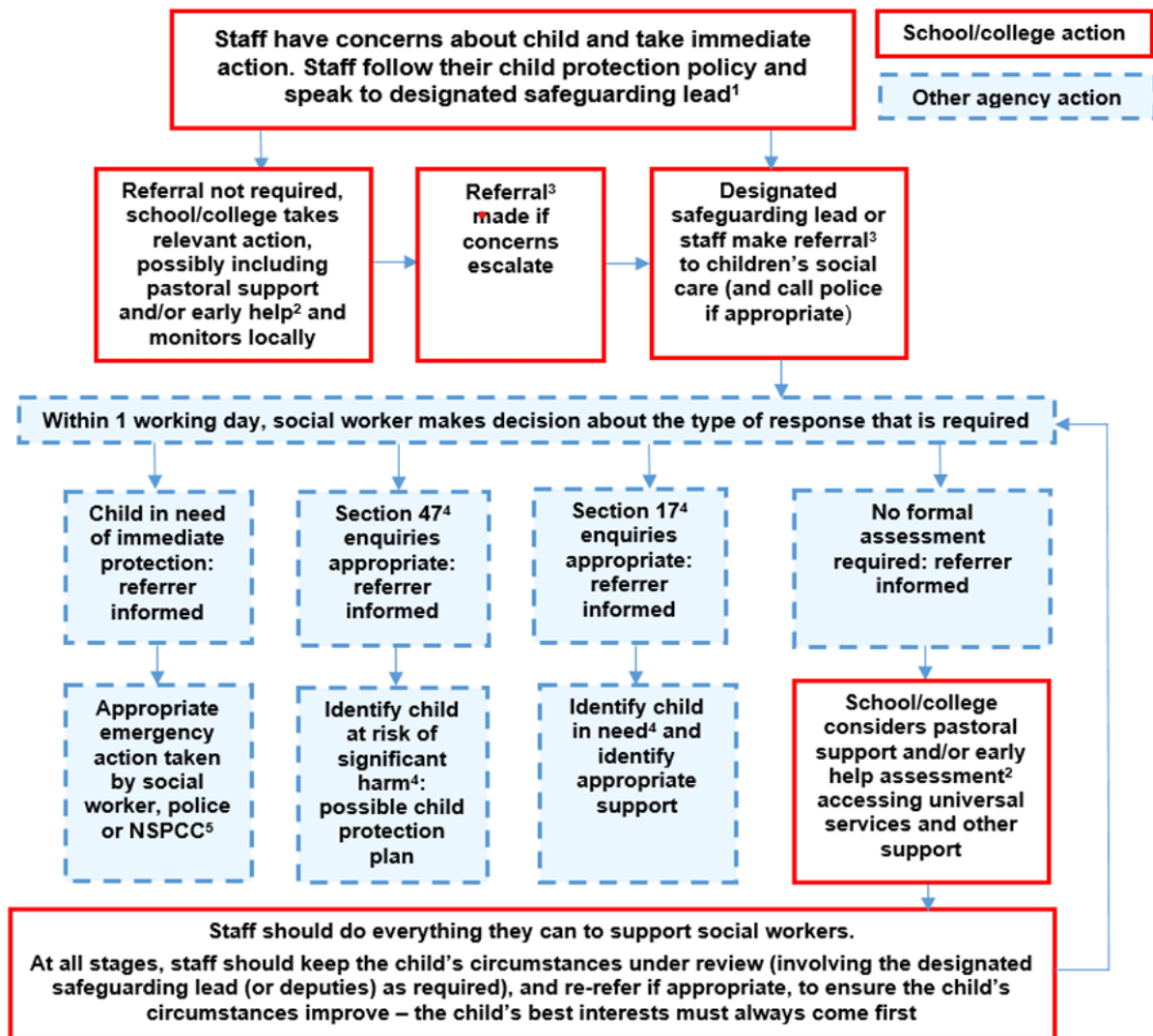
UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people - Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

Support for parents/carers

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

Appendix 10: Actions where there are concerns about a child (KCSIE, September 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.

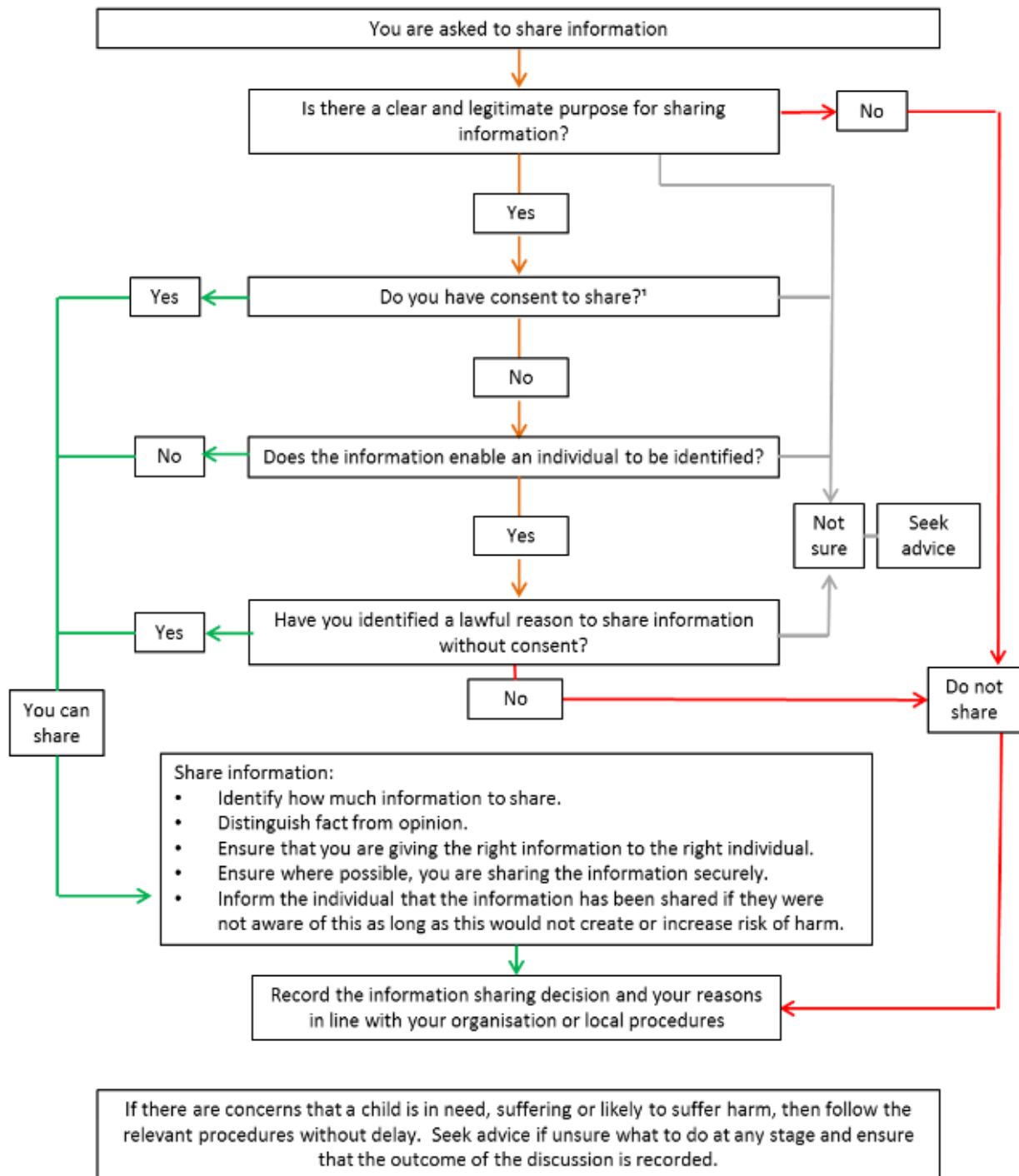
² Family Help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated Family Help, a family help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the Family 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).

Appendix11: Flowchart of when and how to share information



Appendix 12: Role and Job Description of the Designated Safeguarding Lead (and DDSLs) **(Annex B from KCSIE 2026)**

The Board of Trustees 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,
- 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

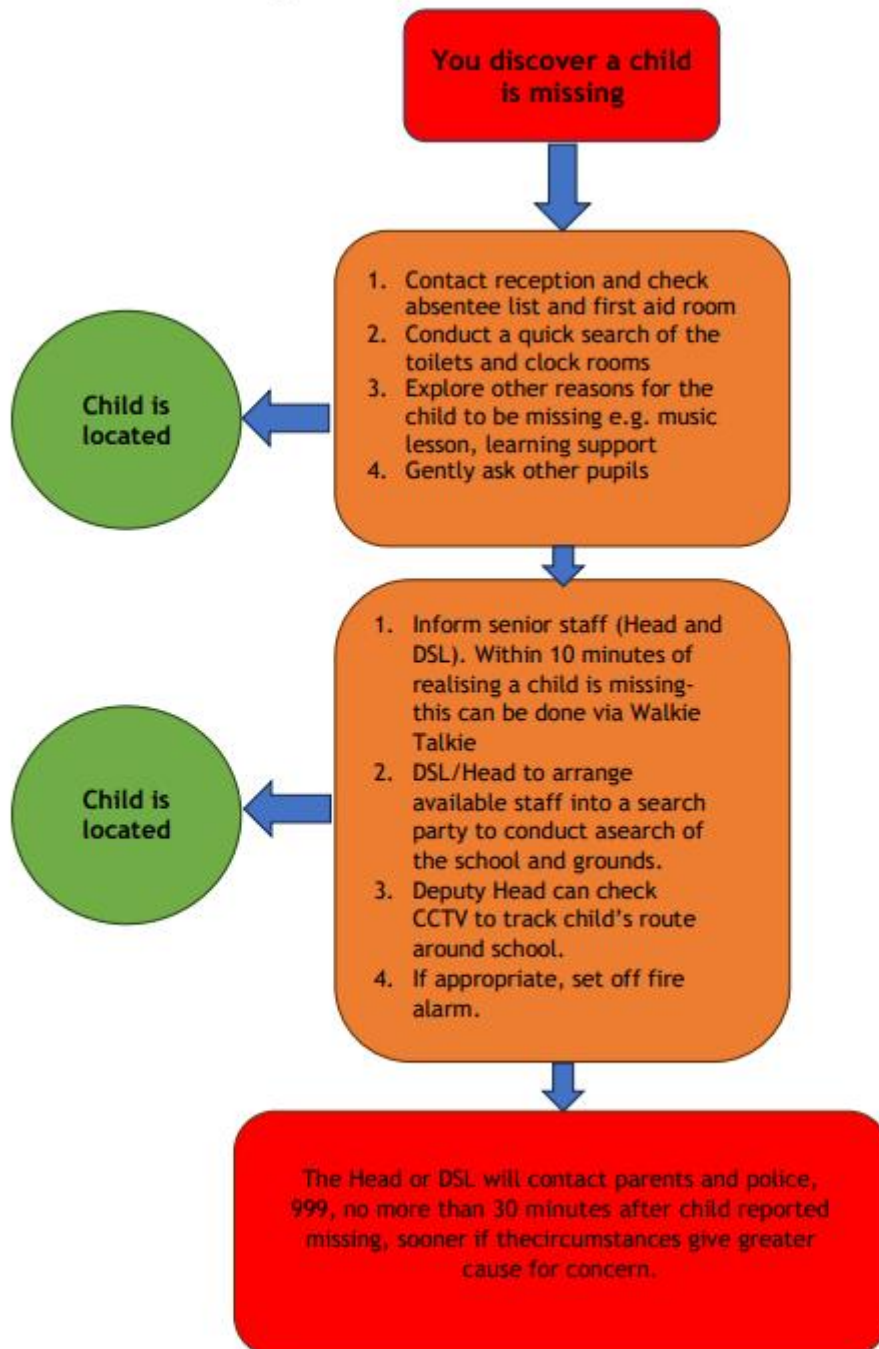
The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead (and deputies) should be equipped to:

- 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 13:

What to do if a child goes missing in school



What to do if a child goes missing on a school trip or fixture (off site activity)

