

SAFEGUARDING POLICY

<p>Policy Owner PPS DSL's</p>	<p>Applies to Prior Park Schools (Trust wide)</p>	<p>Superseded documents Child Protection Policy v3</p>
<p>Associated documents All PPS Associated Safeguarding Policies and schools specific Policies</p>	<p>Review frequency Every year (unless the legislation/regulations update before this time)</p> <p>Implementation date 9 December 2021</p>	<p>Legal Framework DFE KCSIE 2021 See 1.4 below for detailed list</p>

CONTENTS

- 1 Introduction and Principles
- 2 Awareness and Identifying Abuse
- 3 Designated Safeguarding Lead
- 4 School Procedures: Responding to Concerns
- 5 Allegations Against a Member of Staff
- 6 Role of the Governing Body
- 7 The Early Years Foundation Stage
- 8 Safeguarding in the Boarding Community

APPENDICES

- 1 Safeguarding Process and Flow Charts
- 2 Definitions and Types of Abuse and Neglect
- 3 Youth Produced Sexual Imagery (Sexting)
- 4 Child Abuse: Crisis Management Plan
- 5 Response to an Incident of a Missing Child
- 6 DSL (and DDSL) Job Description

Prior Park Schools recognises its moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We expect everyone who works and volunteers at PPS to share in this commitment. This policy applies to all students including the Early Years Foundation Stage (EYFS) and the words 'child' and 'children' in this policy include everyone under the age of 18 or whilst still in education at one of our schools.

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

Last reviewed by:	DSLs (Mr S Cane-Hardy, Mrs S James and Ms D Perry) and Head of Compliance (Emma Wickham)
Date last reviewed:	November 2021
Approved by Trustees:	Board of Trustees
Date last approved:	9 December 2021
Date for next approval:	August 2022

Introduction

Prior Park Schools (PPS) comprises three schools. Two of those schools, Prior Park College (PPC) and The Paragon School (TP) are incorporated in England as Prior Park Educational Trust Ltd. The third school, Prior Park School Gibraltar (PPSG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

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.

1. PRINCIPLES

- 1.1 Prior Park Schools recognise the duty to safeguard the welfare of children: protecting them 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 possible outcome. This policy outlines the three schools’ approach to safeguarding. All staff, volunteers and Trustees have a role to play in safeguarding children, including the promotion of each child’s welfare. Prior Park Schools will work with all relevant agencies to promote the welfare of children and protect them from harm as a fundamental part of our intent to provide excellent pastoral care to all students.
- 1.2 The purpose of a Safeguarding Policy is to inform the school community- staff, volunteers, parents, Trustees and students about the school’s responsibilities for safeguarding children and to enable everyone to know how these responsibilities should be carried out. This is part of an environment where children and staff feel secure, are encouraged to talk, and all are listened to when they have a worry or concern.
- 1.3 The policy will be reviewed annually by the Governing Body. It will be implemented through the induction and training programme of the Prior Park Schools, and as part of day-to-day practice.
- 1.4 All action is taken in line with relevant legislation and guidance including:
 - Keeping Children Safe in Education (DFE Sept 2021)
 - Sexual Violence and Sexual Harassment between children in schools and colleges Sept 2021
 - Sharing nudes and semi-nudes: advice for education settings working with children and young people (2020)
 - Disqualification under the Childcare Act 2006 (August 2018)
 - What to do if you are worried a child is being abused (March 2015)
 - Working Together to Safeguard Children (2018)
 - Revised Prevent Duty Guidance for England & Wales (April 2019)

- The Prevent Duty: departmental advice for schools (June 2015)
- The use of social media for online radicalisation (July 2015)
- Relationship's education, relationships and sex education (RSE) and health education (July 2019)
- NSPCC; When to call the Police
- The Children Act 1989, The Children Act 2004
- Education Act 2002, Section 175 and Section 157
- National Minimum Standards for Boarding, April 2015
- Independent School Standards Regulations November 2014
- South West Child Protection Procedures (SWCPP) at www.swcpp.org.uk
- Bath & North East Somerset Community Safety and Safeguarding Partnership (BCSSP) (HMGoGDO in Gibraltar)
- Gibraltar Child Protection Procedures - Gibraltar Child Protection Committee

- 1.5 All staff, because of their contact with and knowledge of the children in their care, are well-placed to identify abuse and offer support to children in need or at risk. The staff and Trustees are committed to ensuring a safe and suitable environment through safer recruitment, training of staff and deployment of suitable designated senior lead teachers to guide staff. In addition, all staff and volunteers must understand and adhere to a defined Staff Code of Conduct Policy. Staff should feel free to raise concerns about any unsafe practice (as referred to in the Low-level Concern Policy and Reporting a Concern at Work 'Whistle-blowing' Policy). Students will be given opportunities through the pastoral programme to develop the skills to stay safe and avoid abuse and to access the appropriate support in the Prior Park Schools, including advice on e-safety.
- 1.6 This Policy is available to all members of the community on the Prior Park Schools' websites. A paper copy is available on request. Prior Park Schools aim to create a culture of safeguarding and recognise that the Safeguarding Policy operates in conjunction with other related policies, including Safer Recruitment, Peer-on-Peer Abuse, Low-level Concerns, Health and Safety, Counter-Bullying, Behaviour Management (Reward and Sanctions), ICT and Social Media Policies and Cyberbullying, HR Policies and the Staff Code of Conduct.
- 1.7 Careful staff recruitment procedures are essential and Prior Park follows a systematic process, with defined steps and use of staff trained to identify risks to children on all interview panels.

False statements in any application will be reported to the Disclosure and Barring Service or other authority, as appropriate.

1.8 KEY CONTACTS

Prior Park Schools Designated Safeguarding Leads and Deputies:

The Paragon School

DSL: Mrs S James (Assistant Head, Pastoral) 01225 310837 (Mobile: 07584 016065)- and Prevent and EYFS Lead

Deputy: Mr Justin Ryan (Deputy Head)- Lead for Looked after Children

Miss Emily Murphy (Key Stage 1 Lead)- Lead for Mental Health

Mr Gareth Millar (Key Stage 2 Lead) 01225 310837 Lead for Digital Strategy and E-Safety

Prior Park College

DSL: Mr S Cane-Hardy (Deputy Head Pastoral) 01225 835353 (Mobile: 07584 016050)- Prevent Lead Deputy:

Izzy Burton (Assistant Head Intervention)
Melanie Gittins (Lead Nurse) 01225 831019 Mob: 07584 016123
David Sackett (Assistant Head Wellbeing)- Lead for E-Safety
Emma Wickham (Head of Compliance)

School Counsellor: Mrs J Robertson: 01225 330096 / email:
counselling@priorparkschools.com

Prior Park School, Gibraltar

DSL: Ms D Perry (Assistant Head Welfare) : 00350 20062006

Deputy: Mr R Azopadi 00350 20062006

School Counsellor: Ms P Felices email: pfelices@priorparkschools.com or
patsy.felices@gmail.com

For all Prior Park Schools

Chair of Trustees: Mr John Shinkwin
Vice Chair of Trustees: Ms Anne Shepherd
Safeguarding Trustee: Mr Simon Head

Chairs of Local Boards

PPC: Mrs Margaret Moore
TPS: Mrs Jane Singleton
PPSG: Ms Anne Shepherd

Ofsted: 0300 123423
Independent Schools Safeguarding Authority 0300 1231111

Bath and North East Somerset Contacts

Local Authority Designated Officer
Francesca Hepden
Independent Chair/LADO
t. 01225 396804
t. 07967793094
e. LADO@Bathnes.gov.uk

Children and Families Assessment and Intervention Team

t. 01225 396312/01225 396313
Julie Downey
t. 01225 396 974
e. julie_downey@bathnes.gov.uk

Emergency Duty Officer (Out of hours)

t. 01454 615165

Missing Education Officer

t. 01225 713010

Children's Social Care

t. 01934 426444

Senior Human Resources Manager for Schools and EYFS

Hester Edmond

t. 01225 394490

e. hester_edmond@bathnes.gov.uk**EYFS: Ofsted**

Pre-School @MPS

t. 0300 1231231

e. enquiries@ofsted.gov.uk**Bath & North East Somerset Community Safety & Safeguarding Partnership**<https://www.safeguarding-bathnes.org.uk/children>**Contact details for advice and support about extremism**

For Prevent Duty: contact LADO or contact local police or call 101

In emergencies: 999 or anti-terrorist hotline 0800 789321

(DfE helpline for non-emergency advice for staff & trustees: 020 7340 7264

and counter-extremism@education.gsi.gov.uk)

For reporting FGM, contact CSC and local police (mandatory from October 2015)

Gibraltar Contacts**Gibraltar Care Agency - Child Protection Team**Referral.concernsforachild@careagency.gov.gi

Duty Social worker: 200 78528

Out of hours Emergency: 200 72500 (Royal Gibraltar Police)

HELPLINES PROVIDED FOR STUDENTS**Prior Park College**

Childline 0800 1111

PPC School Counsellor 01225 330096 (Jan Robertson)

The Line 0800 884444

National Drugs Helpline 0800 776 600

The Paragon School

Childline 0800 1111

School Counsellor (via DSL and Pastoral team)

Prior Park School, Gibraltar

Social Services 200 75729

Childline 8008

Addiction Helper- Free and confidential advice on dealing with addiction

Tel: 0800 915 9401

Alcoholics Anonymous- Nazareth House
Tel: 200 73774 or 54070676

Narcotics Anonymous- Nazareth House
Tel: 200 70720 or 58009064 or 20045942

The Care Agency Access to counselling through Children and Family Services
Tel: 200 78528

The Chaplain- The Lay Chaplain is always happy to talk and to listen, they are readily available in school.

2. AWARENESS AND IDENTIFYING ABUSE

- 2.1 Staff are well-placed to monitor student welfare, observing appearance and behaviour. A child protection concern may come to the attention of school staff or volunteers in a variety of ways, such as observation, student disclosure, third party disclosure, or staff knowledge. Any suspicion, allegation or incident of abuse should be reported to the Designated Safeguarding Lead for child protection in the school (DSL) as soon as possible.
- 2.2 It is not the primary responsibility of the school to investigate suspected or alleged abuse; the issue must be reported to the Bath & North East Somerset Community Safety and Safeguarding Partnership (BCSSP) and Police and Social Services who will normally conduct any investigation. In Gibraltar the LADO is referred to as HMGoGDO.
- 2.3 Child abuse occurs when a person or group abuses or neglects a child by inflicting harm, or by failing to act to prevent harm, in the following four categories:
- Physical abuse. For example, this may involve hitting or otherwise causing physical injury. Female Genital Mutilation (FGM) or risk of FGM should be treated as a child protection issue in this category.
 - Emotional Abuse. For example, conveying to children that they are unloved, inadequate or unvalued. This may also involve psychological manipulation causing behavioural shifts in the child.
 - Sexual abuse. For example, forcing a child to take part in sexual activities, involving children in looking at pornography, behaving in sexually inappropriate ways or attempting to groom a child. Be aware of potential Child Sexual Exploitation (CSE) and the impact this may have on a student's manner and presentation.
 - Neglect. The persistent failure to meet a child's basic physical, emotional and psychological needs.
- (Details of signs of abuse can be found in Appendix 2 to this Policy).*
- 2.4 Who are potential abusers? Abusers can be parents or carers, siblings, neighbours, teachers, strangers, or other students. Do be aware of the possibility of groups of students bullying another student and this turning into a form of abuse.
- 2.5 Peer-on-peer abuse: All staff should be aware that children can abuse other children. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse (See Appendix 2 and The Peer-on-Peer Abuse Policy) and know how to identify it and respond to reports. Staff should understand, that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse, they should speak to their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed in Appendix 2, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

If a child’s report of peer-on-peer abuse is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether this was a ‘cry for help’ or whether disciplinary action, in line with the schools’ sanctions, is needed. An investigation will be held, and support provided to all children indicated, including the alleged perpetrator.

2.6 Sharing nude images or videos must be a focus for staff awareness and steps must be taken both to raise awareness and to educate students to avoid the creation and sending of sexualised images and remarks. Pressure can be exerted on students through images and messages by their peers and action must be taken to support students and to counter this damaging behaviour. When dealing with issues relating to sharing nudes, staff should follow the guidance detailed in Appendix 3 and show sensitivity, put the welfare of the young person first and operate within the context of the Safeguarding Policy.

2.7 Online Safety: It is essential that children are safeguarded from potentially harmful and inappropriate online material. PPS approach to online safety seeks to empower each school to protect and educate students, staff and parents in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk - these are outlined in Appendix 2.

We recognise that online safety is ongoing theme that requires constant engagement with students, staff and parents. Online safety is a theme linked in a number of PPS policies; E-Safety, Acceptable Use, Mobile Devices, Cyber-bullying, Counter Bullying, Behaviour.

2.8 We aim to prevent child abuse by appropriate recruitment procedures (see Safer Recruitment Policy and Procedure). Staff are trained to be aware of safeguarding and child protection through induction and a planned cycle of training. There is a staff code of conduct and children are given accessible pastoral support plus a pastoral programme to develop students’ awareness and knowledge of potential dangers. Children are taught how to be safe, including how to stay safe online and how to use mobile technology appropriately inside and outside of school. Prior Park Schools have a culture of listening to children, using class teachers and tutors as daily points of contact. This is complemented by medical centres, counselling services, information about helplines (including Childline posters), Chaplaincy and close supervision of students by staff (as appropriate for the age of the students) across the Prior Park Schools. We recognise the seriousness of Mental Health and Wellbeing and our duty to identify issues and support young people. The Prevent Duty Policy also alerts staff to the dangers of the radicalisation of children and gives guidance on how to react if potential radicalisation is suspected.

2.9 If abuse is disclosed or suspected we will act in accordance with procedures put in place by Bath & North East Somerset Community Safety and Safeguarding Partnership (BCSSP) and Police and Social Services who will normally conduct any investigation. In Gibraltar the LADO is referred to as HMGoGDO. The key ideas are to ‘Receive information’, ‘Record it’, ‘Reassure the student’, and ‘Report immediately’ to the DSL. We will help children in

need of support from one or more agencies using local processes such as the 'Common Assessment Framework' (CAF) and 'Team Around the Child' (TAC).

- 2.10 Staff are alert to misuse of social media and electronic devices by students, staff and parents. All users should conform with the Prior Park Schools' ICT Acceptable Use Policy - the Schools will be especially alert to issues of cyberbullying, sexting, and access to unsuitable material.

3. DESIGNATED SAFEGUARDING LEAD (DSL)- Role and Responsibilities

Prior Park Schools have appointed senior teachers or members of the SMT or SLT as Designated Safeguarding Leads. They are supported by nominated deputies. Their role is to manage referrals, ensure training and to raise awareness. The DSL and Deputy DSL in all the Prior Park Schools have the same level of training.

Prior Park College (PPC)

DSL and Prevent Lead: Simon Cane-Hardy (Deputy Head Pastoral) 01225 835353,
Mobile: 07584 016050

Deputy DSL:

Izzy Burton (Assistant Head Intervention)
Melanie Gittins (Lead Nurse)
David Sackett (Assistant Head Wellbeing)- lead for E Safety
Emma Wickham (Head of Compliance)

The Paragon School (TPS)

DSL: Mrs S James (Assistant Head, Pastoral) 01225 310837 (Mobile: 07584 016065) and
Lead DSL for EYFS and Prevent

Deputy DSL:

Justin Ryan (Deputy Head) - lead for Looked After Children
Emily Murphy (Key Stage 1 Lead)- lead for Mental Health
Gareth Millar (Key Stage 2 Lead)- lead for E Safety

Prior Park School, Gibraltar (PPSG)

DSL: Danielle Perry (Assistant Head Welfare) 00350 20062006 (Mobile:0035054086691)

Deputy DSL:

Mr R Azopardi 00350 20062006

For urgent Child Protection matters outside of term time, the DSLs can be contacted using the mobile numbers above.

See Appendix 6 for the DSL and DDSL Job Description.

4. SCHOOL PROCEDURES: RESPONDING TO CONCERNS

All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

4.1 All members of staff must know:

- The school's Safeguarding Policy
- The school's Peer-on-Peer Abuse Policy
- The school's Staff Code of Conduct
- The identity of the Designated Safeguarding Lead (DSL) and the Deputy DSL(s)

- The identity of the Safeguarding Trustee
- They must be aware and have the view that “...it could happen here”
- The importance of listening to children

4.2 Any member of staff or volunteer who receives a disclosure of abuse or who suspects abuse must report it immediately to the Designated Safeguarding Lead (DSL) or, if he/she is unavailable, to their Deputy DSL.

If staff have **any concerns about a student**, they should inform the DSL as a matter of urgency. Early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

All staff are under a duty to report all suspicions of abuse to the DSL so they can be passed on to Social Services. This is an inescapable personal and professional responsibility.

Prior Park Schools have a Raising a Concern at Work ‘Whistle blowing’ Policy and a member of staff has the right to go directly to the BCSSP or Children’s Social Care if they feel it is appropriate.

4.3 The member of staff must record information that day. A clear, factual account is required (with date, time of incident, note of any witnesses).

4.3 At The Paragon School, the member of staff must record information that day using CPOMS, following the prompts on the incident form. A clear factual account is required.

4.4 If a child discloses abuse, the member of staff must follow the principles stated:

- Listen without displaying shock or disbelief
- Allow the child to talk freely (follow TED - Tell, Explain, Describe)
- Do not ask leading questions
- Do not promise confidentiality
- Stress it is right to tell
- Make a written record in accordance with 4.3 above
- Explain what has to be done and who has to be told
- Pass the information to the Designated Senior Lead without delay

In the case of a low-level concern, the options for further action by the school will include managing any support for the child internally via the school’s pastoral support system, an early help assessment or a referral for statutory services. Early help processes are usually initiated by the DSL or Deputy DSL.

4.5 The DSL will consider the information and contact the BCSSP/HMGoGDO. The DSL will not seek to investigate. If there is a risk of immediate harm, the issue must be referred to Children’s Social Care immediately.

4.6 The DSL will take account of the child’s views and wishes at all times in determining the necessary course of action.

4.7 Appropriate sharing of information is vital. Information should be confined to those who need to know, avoiding any ‘loose talk’. Breaches of privileged information may lead to disciplinary action.

4.8 Staff must be aware that a student may suffer significant harm due to the behaviour of another student or students. Behaviour that is dealt with under the Counter-Bullying

Policy and Cyber-Bullying Policy may be of such seriousness that it puts victims and perpetrators at risk. This must be referred to the BCSSP/HMGoGDO and/or the Police.

- 4.9 Be aware that children with **special educational needs and/or disabilities (SEND)** can face additional safeguarding challenges and that barriers may exist in recognising abuse in this group of children. Avoid assuming that potential indicators such as mood, behaviour and injury arise from their condition. Staff must remain aware that children with SEND are more prone to peer group isolation or bullying, including prejudice-based bullying, than other children. Also appreciate that elements like bullying and inappropriate behaviour may have disproportionately deep impact, without showing any external signs, but barriers in communication might mask signs and hinder expression.
- 4.10 All staff are expected to identify when a child may benefit from **Early Help**. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Staff should be alert to the potential need for early help for a child who is disabled and has specific additional needs, has special educational needs, is a young carer, is showing signs of being drawn into anti-social or criminal behaviour, is frequently missing from home (or care), is misusing drugs or alcohol or is at risk of modern slavery, trafficking or exploitation.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the BCSSP/HMGoGDO referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to Children's Social Care if the student's situation does not appear to be improving.

All staff should consider the context within which any incidents occur by taking into account the wider environmental factors that are present in a child's life which could be a threat to their safety or welfare.

- 4.11 PPS takes the many steps to minimise the risk of peer-on-peer abuse by always emphasising the importance of kindness and tolerance. This is, for example, achieved through assemblies, tutorials and PSHCE lessons, in which safeguarding and anti-bullying is a taught topic. However, we recognise that a 'one size all' approach may not be appropriate for all students.

Where an issue of student behaviour or bullying gives reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, staff should follow the Child Protection procedures set out in 2.8 rather than the PPS Counter-Bullying and schools own Behaviour policies. Victims will be supported by the appropriate member of staff and support from external agencies will be sought, as appropriate.

Any peer-on-peer abuse will be investigated and recorded in line with the PPS Peer-on-Peer Abuse Policy. If deemed to be of a sufficiently serious nature, abuse will be reported to local agencies. In the event of disclosures about student-on-student abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the appropriate member of staff and support from external agencies will be sought, as appropriate.

- 4.12 A student against whom an allegation of abuse has been made may be suspended from a School during the investigation. The school will take advice from the BANES BCSSP/HMGoGDO (or Gibraltar Child Protection Committee) in the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved, including the alleged victim and perpetrator. If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the appropriate BCSSP/HMGoGDO, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the appropriate BCSSP/HMGoGDO and/or the Police as appropriate.
- 4.13 PPS' approach to the sharing of nude, or semi-nude, images or videos is detailed in Appendix 3
- 4.14 In the event of disclosures about student-on-student abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be taken seriously, kept safe and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.
- 4.15 The threshold for dealing with an issue of student behaviour or bullying under this policy is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Any such abuse will be reported to local agencies. In the event of disclosures about student-on-student abuse, all children involved, whether perpetrator or victim, are treated as being 'at risk'.
- 4.16 **Children who go missing from education**, particularly on repeat occasions, can be an indicator of abuse or neglect. In some cases, it might be a concern under the Prevent Duty. PPC and TP will report to the BANES Local Authority when a student who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

PPSG will report to **Gibraltar Care Agency - Child Protection Team**
Referral.concernsforachild@careagency.gov.gi
Duty Social worker: 200 78528
Out of hours Emergency: 200 72500 (Royal Gibraltar Police)

5. ALLEGATIONS AGAINST A MEMBER OF STAFF

The Prior Park Schools' procedures for managing allegations against staff, Trustees, volunteers and contractors, who are currently working in the schools follow KCSIE 2021, DfE guidance and the BCSSP/Gibraltar Care Agency arrangements.

There are two levels of allegation/concern:

Allegations that may meet the harms threshold. These should be reported to the Head immediately.

**If the Head is the subject of an allegation, it must be reported to the Chair of Trustees. Where an allegation is against the Head, the Head must not be informed of the allegation prior to contact with the chair and LADO*

An allegation that may meet the harms threshold may include, for example:

- a member of staff has behaved in a way that has harmed a child

- possibly committed a criminal offence against a child behaved in such a way that indicates they may not be suitable to work with children

Allegation/concerns that do not meet the harms threshold, hereafter referred to as ‘low level concerns’.

As part of our whole school approach to safeguarding, Prior Park Schools ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the Trust (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

We have a culture in which all concerns about adults, including allegations that do not meet the harms threshold for a LADO referral, are shared responsibly and with the right person, recorded and dealt with appropriately.

This encourages an open and transparent culture; enabling Prior Park Schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of PPS are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Any ‘low level concerns’ must be reported to the Head.

Examples of a low-level concern could be:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Where a third party has raised the concern, the Head should collect as much evidence as possible by speaking:

- directly to the person who raised the concern (if known);
- to the individual involved and any witnesses.

The Head should record all low-level concerns in writing. This should include:

- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken;
- the rationale for decisions and action taken;
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).

The records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR. They **should be reviewed** so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the

school should either take action through its disciplinary procedures or, if it meets the harms threshold, refer to the LADO.

- 5.1 An allegation is any information which indicates that a member of staff (including supply staff)/DSL/volunteer/Head and contractors may have:
 - Behaved in a way that has, or may have harmed a child
 - Possibly committed a criminal offence against or related to a child
 - Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- 5.3 If an allegation is reported to you or you become aware of a concern, take it seriously. Follow the procedure of making a clear written record, not promising confidentiality, not asking leading questions. Report to the Head without delay, who will inform the DSL. The DSL will keep the Head informed of any progress with an allegation against a member of staff. A decision on how to proceed (and whether to suspend a member of staff) will be taken by the Head after consultation with the BCSSP/HMGoGDO. Action will be based on section 2, part 4 of KCSIE 2021 (with additional information on allegations against supply teachers.)

- 5.4 Allegations against the Head should be referred to the Chair of Trustees. In the absence of the Chair of Trustees, the Vice Chair should be contacted. The Head must not be informed - leave this to the Police/LADO/ HMGoGDO for action.

- 5.5 If an allegation is made against the DSL, then the Head will not consult or inform the DSL but will leave this to the Police/ BCSSP/HMGoGDO for action.

- 5.6 If an allegation is made against a member of the residential staff, the Head may require the staff member to relocate to a residence off-site, pending a full investigation.

- 5.7 Where there is a conflict of interest in reporting the matter directly to the Head, the member of staff should contact the LADO directly.

- 5.8 Where the allegation has been made against a member of supply staff provided by an agency, the agency will be fully involved. This also includes reports of any low-level concerns so that any patterns of inappropriate behaviour can be identified.

- 5.8 If a member of staff ceases their role or employment in the circumstances set out in paragraph 5.1 above, a report will be made to the DBS promptly. A referral will also be made to the Teaching Regulation Agency (TRA) where a teacher has been dismissed for misconduct (or would have been dismissed had he/she not resigned first). The School is also committed to reporting to the DBS any person/volunteer, employed, contracted or student, whose services are no longer used, but DBS referral criteria are met.

- 5.9 Should the Head feel the allegation meets any of the stated criteria he will contact the LADO within one working day. If the BCSSP/HMGoGDO decides it is not at this level it will be referred back to the school for action. Informing the subject will occur only following briefing from the BCSSP/HMGoGDO.

- 5.10 At all times the matter will be handled with due regard for confidentiality and potential for professional damage due to unfounded or malicious allegations.

The NSPCC whistleblowing helpline is available to staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 - available from 8:00 AM to 8:00 PM, Monday to Friday, and email: help@nspcc.org.uk

Further information and guidance can be found in the Low-level Concerns Policy

6. ROLE OF THE BOARD OF TRUSTEES

- 6.1 The Board of Trustees has strategic leadership responsibility for Prior Park Schools' safeguarding arrangements.
- 6.2 The Governing Body must ensure that safeguarding procedures are reviewed annually, and the Safeguarding Policy updated as required. The Chair of Trustees must sign off the policy as approved, with advice of the Board of Trustees and the Nominated Safeguarding Trustee. The Trustees will use the ISI Safeguarding Policy Checklist to ensure the policy is compliant.
- 6.3 There is a nominated trustee, Mr Simon Head, with lead responsibility for child protection across the Trust, who has suitable training. Mr Head is the Safeguarding Trustee. He is supported by Mr Laurence McKell, as Deputy Safeguarding Trustee.
- 6.4 The Board of Trustees must ensure that:
- There is a whole school approach to safeguarding
 - There are safe recruitment procedures
 - All systems operate with the best interests of the child at heart, and there are suitable means by which students can say what is happening to them and know that they will be heard.
 - There are suitable child protection policies and procedures
 - The Heads of Prior Park Schools make sure staff understand and follow these policies and procedures.
 - Suitable DSLs and deputies are appointed in the Prior Park Schools with their job descriptions including detail of their DSL duties
 - Relevant safeguarding training for school staff is attended
 - Allegations are managed appropriately
 - Any deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- 6.5 The Chair of Trustees has a duty to deal with any allegations made against the Head.
- 6.6 All Trustees must be able to identify the nominated DSLs and their deputies. All Trustees must also complete annual safeguarding training and read the latest government guidance (e.g. KCSIE).
- 6.7 The nominated trustee for safeguarding meets with the DSLs at least termly to complete a safeguarding review, and annually to complete a safeguarding audit. These are all reported to the Local Board and full Board meetings.

7. CHILD PROTECTION (SAFEGUARDING) IN THE EARLY YEARS FOUNDATION STAGE (EYFS)

- 7.1 All elements of this Policy apply to the Pre-Prep Departments (including EYFS) within the Prior Park Schools.

- 7.2 At the Paragon School Sarah James, is the DSL for the EYFS and Emily Murphy is the Deputy DSL.
- 7.3 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
- 7.4 Prior Park Schools EYFS employees are aware of their duty to report allegations of serious harm or abuse to Ofsted.
- 7.5 The Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009 place separate and additional requirements on the EYFS departments of Prior Park Schools.
- a. 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.
 - b. In the case of workers that are supplied by an agency or third party organisation, Prior Park Schools will ensure that the agency or organisation has carried out the relevant checks, including the Disqualification from Childcare check.
 - c. The grounds for disqualification are, in summary, that:
 - d. a person is barred from working with children;
 - e. they have been cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad;
 - f. other orders have been made against them relating to their care of children;
 - g. they have had their registration refused or cancelled in relation to childcare or children’s homes or have been disqualified from private fostering.
 - h. Schools may not employ people who are “disqualified” to work in these settings (7.5.3) or allow them to be directly concerned with their management.
 - i. 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.
 - j. 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).
 - k. 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.
 - l. 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.

When it is identified that an individual is disqualified, where possible, employees who work in the specified Early Years or later years provision, or those concerned with the management of such provision, should be asked to provide the following information about themselves:

Details of any order, determination, conviction, or other ground for disqualification from Registration under the Childcare (Disqualification) Regulations 2009

- i. The date of the order, determination or conviction, or the date when the other ground for disqualification arose

- ii. Information about the body or court which made the order, determination or conviction, and the sentence (if any) imposed
- iii. A certified copy of the relevant order (in relation to an order or conviction)
- iv. The school must inform Ofsted of the relevant disclosure within 14 days.

7.6 Control of images and use of mobile devices. In Pre-Prep and the EYFS, all staff and support staff 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 students. Only devices provided by Prior Park Schools may be used to record school matters, including images of students and their work, but no images may be uploaded to the web or social media sites without express approval of a member of the school leadership team. No images should be sent to or stored on any personal device.

8. Child Protection (Safeguarding) in the Boarding Community at PPC

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

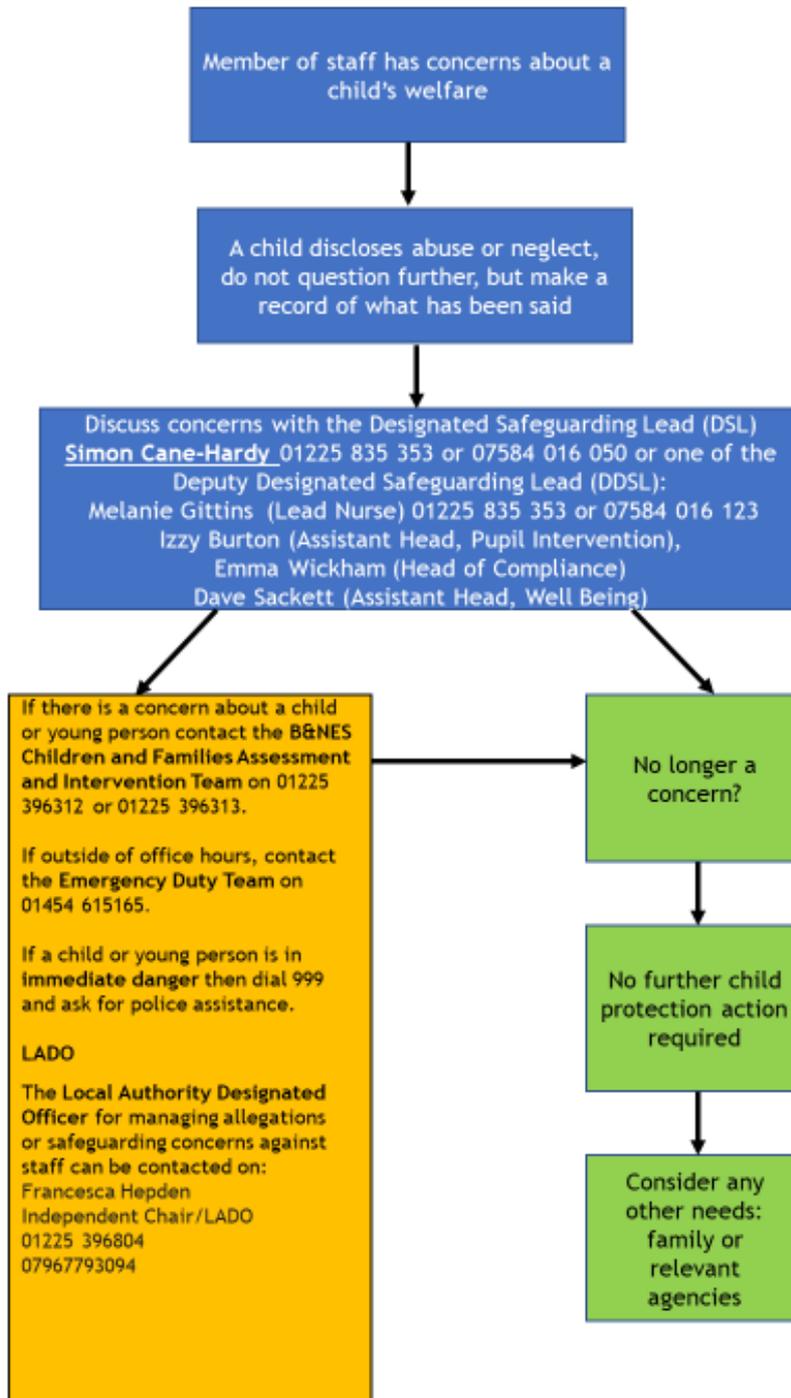
In cases where a member of boarding staff is suspended pending an investigation of a child protection nature, PPC will provide alternative accommodation off-site to ensure the appropriate safeguarding of boarders. In the case of a member of the boarding staff leaving site, PPC will make arrangements to ensure staffing levels are maintained within the boarding house.

If an adult living in Boarding accommodation (who is not employed by PPS) is under investigation for a child protection reason, they will be asked to leave the accommodation and site with immediate effect. (As per the Adults Living in Accommodation Policy and agreement)

APPENDIX ONE

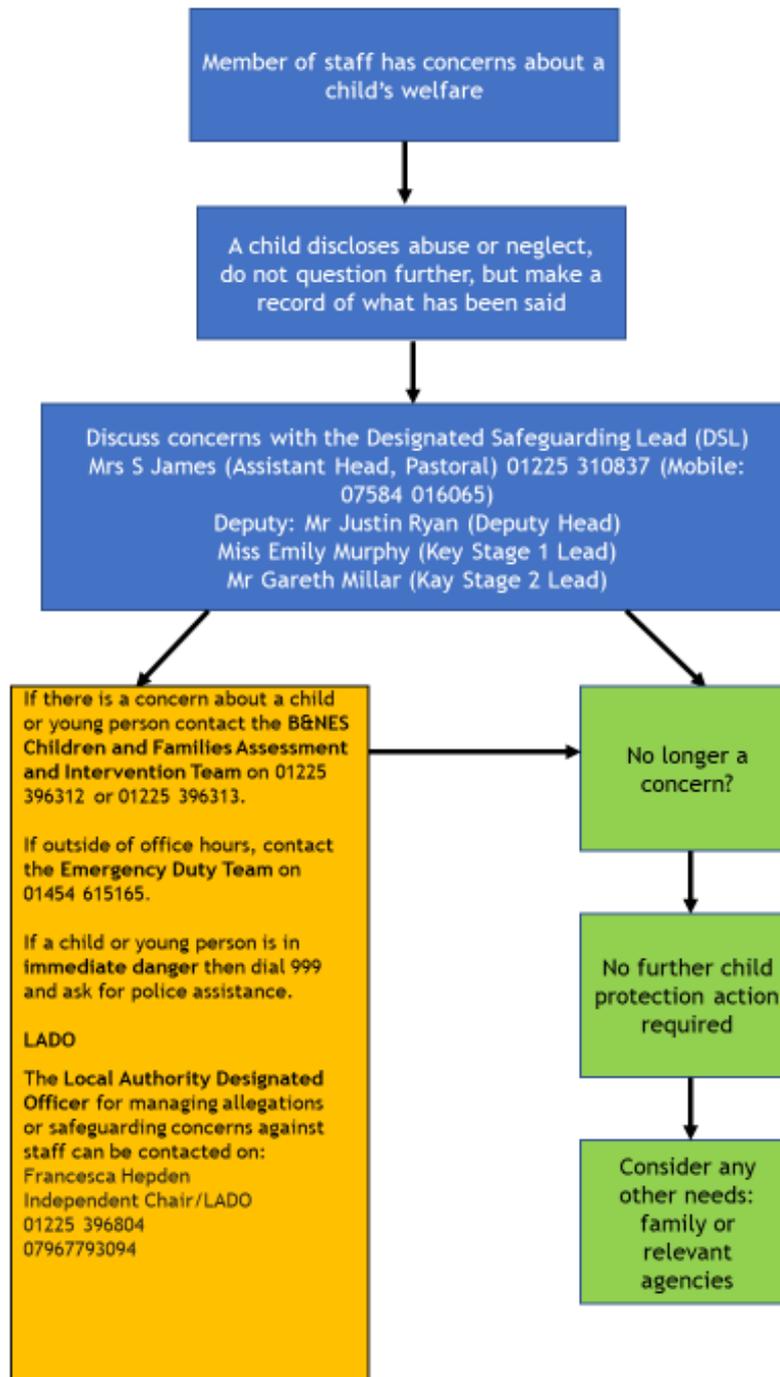
**BATH AND NORTH EAST SOMERSET COMMUNITY SAFETY AND SAFEGUARDING PARTNERSHIP
Prior Park College**

What to do if you are worried a child is being abused or neglected



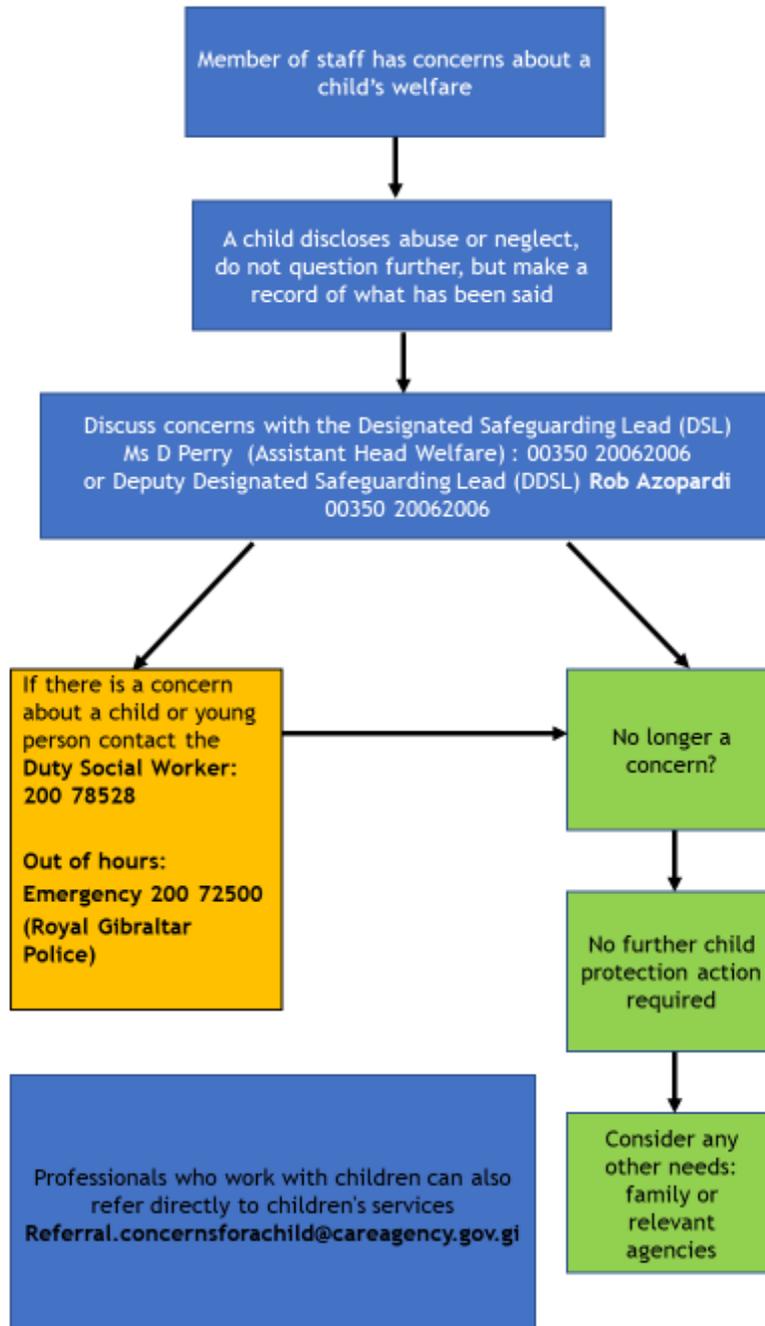
**BATH AND NORTH EAST SOMERSET COMMUNITY SAFETY AND SAFEGUARDING PARTNERSHIP
CHILDREN BOARD
The Paragon School**

What to do if you are worried a child is being abused or neglected



**GIBRALTAR CARE AGENCY
Prior Park School Gibraltar**

What to do if you are worried a child is being abused or neglected



**APPENDIX TWO
DEFINITIONS AND TYPES OF ABUSE AND NEGLECT**

Children	Anyone who has not yet reached their 18 th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.
Safeguarding and promoting the welfare of children	Defined for the purpose of this guidance as: Protecting children from maltreatment; Preventing impairment of children’s health or development; Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and Taking action to enable all children to have the best life chances.
Child Protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical abuse includes a parent or carer fabricating the symptoms of, or deliberately inducing, illness in a child.
Emotional Abuse	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or “making fun” of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
Psychological Abuse	This is often a form of emotional abuse, which may result in a child altering their behaviour or points of view. Staff must therefore be alert to such personal shifts. Peer pressure is impossible to eradicate entirely, but its potentially negative effects must be inhibited as far as possible. An example of potential psychological abuse is the danger of ‘radicalisation’ through exposure to extremist doctrines and beliefs. Our Prevent Duty Policy defines these dangers in greater depth and offers guidance for staff on both how to identify radicalisation, and also how to react to perceived instances of it.
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

	<p>aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>
Neglect	<p>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:</p> <ul style="list-style-type: none"> • 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); or • Ensure access to appropriate medical care or treatment. <p>It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p>
Peer-on-Peer	<p>Staff should be aware that children can abuse other children and it can happen both inside and outside of school and online. Staff need to remain vigilant to the indicators and signs of peer-on-peer abuse and immediately report any concerns to the DSL, or Deputy.</p> <p>It is essential that all staff challenge inappropriate behaviours between peers that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.</p> <p>All staff should be clear of the policy and procedures with regard to peer on peer abuse, see PPS Peer-On-Peer Policy for more information.</p> <p>Staff have an important role they to play in preventing peer on peer abuse and responding where they believe a child may be at risk from it. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.</p> <p>Any child can report a case of peer-on-peer abuse to any adult in the school. A child who reports a case of peer-on-peer abuse should be treated seriously, confidentially and with understanding, following our procedures for disclosure. They should not be made to feel they have spoken out of turn.</p> <p>Staff should not assume that peer-on-peer abuse does not take place in PPS, instead they should keep an open mind with a ‘it could happen here’ approach.</p>
Online Safety	<p>The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:</p>

	<p>Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.</p> <p>Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.</p> <p>Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying;</p> <p>Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group</p>
Young carers	<p>Young carers are children and young persons under 18 who provide or intend to provide care assistance or support to another family member. They carry out on a regular basis, significant or substantial caring tasks and assume a level of responsibility, which would usually be associated with an adult. The person receiving care is often a parent but can be a sibling, grandparent or other relative who is disabled, has some chronic illness, mental health problem or other condition connected with a need for care support or supervision.</p>
Cybercrime	<p>Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include;</p> <ul style="list-style-type: none"> • 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. <p>Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.</p> <p>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.</p> <p>Additional advice can be found at: Cyber Choices, ‘NPCC- When to call the Police’ and National Cyber Security Centre - NCSC.GOV.UK</p>

Recognising abuse: what to look for

Physical Abuse

Signs and symptoms may include:

- Unexplained injuries/burns, abdominal injuries, especially if they are recurrent (and explanations improbable);
- Untreated injuries and fear of medical help;
- Fear of parents being contacted/fear of returning home;
- Self-destructive tendencies;
- Aggression towards others;
- Chronic running away;
- Emotional and behavioural problems;
- Female Genital Mutilation (FGM).

Sexual Abuse

Signs and symptoms may include:

- Chronic depression, suicidal tendencies;
- Loss of self-esteem;
- Self-mutilation, self-hatred and/or self-harm;
- Anorexia or bulimia;
- Excessive use of drink or drugs;
- Recurrent nightmares;
- Fear of undressing (eg for gym);
- Chronic ailments (stomach pains and headaches);
- Inappropriate play (with dolls or with other children).

Emotional abuse

Signs and symptoms may include:

- Feelings of shame or guilt;
- Extreme embarrassment or comments that trigger cause of concern;
- Compulsive stealing;
- Neurotic behaviour (eg. rocking, thumb sucking)
- Over-reaction to mistakes;
- Sudden speech disorders;
- Self-mutilation;
- Child seems withdrawn.

Neglect

Signs and symptoms may include:

- Feelings of shame or guilt, seeming withdrawn;
- Extreme embarrassment;
- Compulsive stealing;
- Neurotic behaviour (eg rocking, thumb sucking);
- Over-reaction to mistakes;
- Sudden speech disorders or difficulty in social situations;
- Self-mutilation;
- Malnourishment;
- Impaired development.

Specific safeguarding issues

Behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger.. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic abuse; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sharing nudes; and trafficking.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations.

Channel

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

Additional support

The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

Arrangements for dealing with peer-on-peer abuse (further details can be found in the Peer-on-Peer Abuse Policy)

Most instances of students causing harm to each other will be dealt with under the School’s Prevention of bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a student towards another (sometimes referred to as peer-on-peer abuse). This type of abuse can happen both inside and outside of School and online. Examples of students’ conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical violence such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);

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

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

Students with Special Educational Needs or Disabilities are particularly vulnerable to peer-on-peer abuse.

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

- enforcing the School's rules, which are explicit about the high standards of behaviour and courtesy the School expects;
- implementing in a consistent way its Behaviour Policy;
- being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing any form of peer-on-peer abuse as 'banter', 'just having a laugh' or 'boys being boys';
- implementing the School's prevention of bullying strategy.

Other strategies in place to prevent the occurrence of peer-on-peer abuse include:

- providing developmentally appropriate PSHE lessons which develop students' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to peer-on-peer abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any students to raise concerns with staff, knowing that they will be listened to, believed and valued

- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable

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

If an allegation of peer-on-peer abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (i.e. where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm), the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the student about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all students involved, including those accused of abuse. Further details on how cases of peer-on-peer abuse will be managed is contained in Part 5 of KCSIE (September 2021).

A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation PPS policies on behaviour and discipline will apply.

If it proves necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the student during the interview. If a student's parents are abroad, the student's education guardian will be asked to support the student and to accommodate him or her if they have been suspended.

Both the victim and the perpetrator will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. The DSL, as part of these procedures, will consider the needs of all those involved (victim, perpetrator and other students at the School) and the measures that need to be taken to protect and keep them safe, this may take the form of a welfare risk assessment. When compiling the risk assessment, appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other students; and any relevant contextual factors. Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

See also each schools Mental Health and Welfare or Mental Health and Wellbeing Policy.

Female Genital Mutilation

Whilst all staff should speak to the DSL (or deputy) regarding any concerns about FGM, teachers also have a legal duty to make a report to the Police where, in the course of their professional duties, they either:

- Are informed by a girl of under 18 that an act of FGM has been carried out on her; or
- Observe 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 a girl's physical or mental health or for purposes connected with labour or birth.

To make a report it is recommended that the person calls 101, the non-emergency number. However, where there is risk of serious immediate harm, then it should be reported immediately to the Police by dialling 999.

Further guidance can be found at the following link:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school has an awareness of exploitation of children along 'county lines'. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

Sexual Violence or Sexual Harassment

Child on child sexual violence or sexual harassment can happen either inside or outside of our schools, as well as online. Staff must take an ‘in can happen here’ approach and treat any disclosure seriously. Any child reporting this type of abuse will need to be supported throughout and helped to feel that they matter. Any member of staff who is aware of any abuse of this type should report it to the DSL or deputy. It is essential staff:

- Challenge inappropriate behaviours
- Make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerate or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- challenge 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.

PPS will ensure that lessons are learnt from any allegation and will adopt a reflective approach, regularly reviewing decisions, actions and policies.

Honour Based Abuse

This encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the multi-agency guidelines: Handling cases of forced marriage.

School staff can also contact the Forced Marriage Unit if they need advice or information:
Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family,

friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Special Educational Needs and/or Disabilities

Students with SEND can face additional safeguarding challenges and may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Children Missing Education

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident of) any student who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more.

Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when students are not at school. This means we need to have a least two up-to-date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

Staff understand what to do when children do not attend regularly.

Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions).

Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

Procedures to inform the local authority when we plan to take students off-roll when they:

- leave school to be home educated;
- move away from the School's location;
- remain medically unfit beyond compulsory school age;
- are in custody for four months or more (and will not return to school afterwards); or
- are permanently excluded

We will ensure that students who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a student leaves the school, we will record the name of the student's new school and their expected start date.

The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Student Registration) (England) Regulations 2006 (as amended).

Elective Home Education (EVE)

UK schools only- When a parent informs the school they are choosing to home educate their child, the school must inform the Elective Home Education department in BANES: email sam_lerway@bathnes.gov.uk

Children who need a Social Worker

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when

the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority when they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Voyeurism (Offences) Act 2019 - Upskirting

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

Staff will be made aware of this act and it will form part of our pastoral education to students.

Safeguarding Education: Online Safety & Relationship Education and Sex Education

The schools teach Safeguarding, specifically Online Safety and Sex and Relationship Education, through its Pastoral education and PSHCE lessons. The planning of these topics is guided by DfE guidance and these topics are a compulsory element of the schools broad and balanced curriculum. We recognise that a one size fits all approach to education is not appropriate for all students.

More information can be found in PPS' E-Safety Policy, PSCHE/Personal Development and Relationship and Sex Education policies. Additional information on Online Safety is Provided in Annex D of KCSIE 2021.

Serious Violence

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

Staff should be made aware of this issue and understand they need to pass any concerns about **signs of exploitation or vulnerability to exploitation to the DSL.**

Domestic Abuse

The Domestic Abuse Act (2021) introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).”

Looked after children and previously looked after children

A named member of the safeguarding team will have responsibility for ensuring that any looked after children, or previously looked after children, remain safe in our school. The Governing body will ensure that the appropriate staff have the training and the information needed in relation to a looked after child's legal status and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Any previously looked after child remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. It is important when working with looked after children and previously looked after children to ensure that all agencies work together, and prompt action is taken when necessary to safeguard these children.

County lines:

“County lines” is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, 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. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered (via the National Referral Mechanism) alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

It is important to focus on building children’s confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children with family members in prison

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

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

APPENDIX THREE

THE SHARING OF NUDES AND SEMI-NUDES

GUIDANCE:

When responding to incidents of a student sharing nudes or semi-nudes, Prior Park Schools will follow the UKIC guidance, published in 2020:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Education

The Prior Park Schools educate young people about the risks associated with sharing nudes or semi-nudes, and other safeguarding issues, through the PSHCE and pastoral education programmes. The learning focuses on:

- what it is
- how it is most likely to be encountered
- the consequences of requesting, forwarding or providing such images
- issues of legality
- the risk of damage to people's feelings and reputations

APPENDIX FOUR

CHILD ABUSE: CRISIS MANAGEMENT PLAN

Procedure to be followed in the event of an incident of major significance:

- The Head seeks advice of the local Social Care Team or Local Authority Designated Officer if there is an allegation against a member of staff (if not available, the Head consults the Duty Social Worker, who alerts the Local Safeguarding Children Board). Outline all available information and be guided by their expertise and procedures. The Head informs the Chair of Trustees, Safeguarding Trustee and Chair of Local Board of the situation. If the allegation concerns the Head, the Chair of Trustees should be contacted directly, and they will take this responsibility.
- Alert police and solicitors as soon as possible in line with LADO/Local Safeguarding Children Board advice.
- Write to all parents to give clear information as soon as possible. This must occur with agreement of Police and LADO but this should be done on “Day One” if appropriate.
- Deal with the press through prepared statements. The Head will act as Press Officer (but may ask his Deputy to act on their behalf).
- Full co-operation will be provided in any investigation, the school being guided by appropriate agencies and school solicitors.

APPENDIX FIVE

RESPONSE TO AN INCIDENT OF A MISSING CHILD

PRIOR PARK COLLEGE:

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

Registration of forms and classes ensures routine vigilance, as does a House routine incorporating nightly prayers and roll call.

If an absence is noted immediate steps must be taken:

1. Gather the group (for example, the whole House or those on a trip) and ask for information.
2. Find those who know the missing student's mobile telephone number and ring it or contact them via Microsoft Teams. Attempt to establish whereabouts.
3. HsM/Senior Staff to contact parents (within an hour), both to seek information and to inform.
4. HsM/Senior Staff to record (in writing) all relevant facts.
5. Alert all Staff using school mobile phone system (Prior Park College) and any sensible and effective means considered appropriate. Arrange a site search by staff. Include local off site areas (Rainbow Wood, Monument Field, the valley below St Mary's, Combe Down village). On school trips, contact the School Base Contact.
6. HsM/Senior Staff to contact police and DSL to contact the Child Missing Education officer/ Local Authority Designated Officer.

THE PARAGON SCHOOL:

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

FROM SCHOOL:

If a student is missing during the school day the following procedure should be followed:

1. Check the receptionist's absentee list and the Medical Room.
2. Explore other reasons for absence, e.g. Music / Speech & Drama lessons, matches, any other individual lessons, i.e. Learning Support; question other children.
3. Inform senior staff (HM/DHM) and carry out a search of the school. Contact parents and the Police no later than one hour after the reported absence and sooner if the circumstances give greater cause for concern.

WHEN ON A SCHOOL VISIT OR ATTENDING MATCHES:

1. Question the other children.
2. Organise a search of the immediate locality.
3. Contact Police.
4. Contact School on mobile phone.
5. Contact parents and the Police no later than one hour after the reported absence and sooner if the circumstances give greater cause for concern.

PRIOR PARK SCHOOL, Gibraltar

Response to an Incident of a Missing Child

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

If an absence is noted immediate steps must be taken

1. Gather the group (for example, the whole class or those on a trip) and ask for information.
2. Find those who know the missing student's mobile telephone number and ring it. Attempt to establish whereabouts.
3. HsM/Senior Staff to record (in writing) all relevant facts.
4. HsM/Senior Staff to contact parents (within an hour), both to seek information and to inform.
5. Alert Senior Staff (Headmaster/Deputy Headmaster) and arrange a site search by staff. On school trips contact the School Base Contact.
6. HsM/Senior Staff to contact parents, both to seek information and to inform.
7. HsM/Senior Staff to contact police and DSL to contact Children's Services.

APPENDIX SIX

DSL and DDSL Job Description

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

Reporting to:

1. Head
2. Nominated Safeguarding Trustee

Prior Park Schools

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

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

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

Purpose of the Role

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

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

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

The Role

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

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

Manage Referrals

Refer all cases of suspected abuse to:

- a) the local authority's Children's Social Services or to the BCSSP/HMGoGDO by following the Prevent referral process.
- b) the Disclosure and Barring Service (DBS), any person (whether employed, contracted, a volunteer or student) who has harmed, or poses a risk of harm to a child and who has been removed from working (paid or unpaid) with children, or would have been removed had he or she not left earlier.
- c) the Police (where a crime is evident, and where serious harm or risk of harm to a child is suspected, the Police will be informed immediately).

Work with others

- a) act as a source of support, advice and expertise for all staff
- b) act as a point of contact with the safeguarding partners
- c) liaise with the Head to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- d) as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- e) liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- f) liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- g) promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- h) work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement. This includes:
 - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort and,
 - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Raise Awareness

- a) ensure each member of staff has access to, and understands, the school's Safeguarding Policy and child protection procedures, especially new and part-time staff
- b) ensure the school's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Head of Compliance to ensure Board of trustee approval

- c) ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- d) help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.
- e) link with the BCSSP/HMGoGDO to make sure staff are aware of training opportunities and local policies and procedures.
- f) ensure student files are sought from and supplied to other schools in an appropriate manner.
- g) ensure National Minimum Standards for boarding are known and followed where relevant, at PPC.
- h) ensure Early Years Foundation Stage (EYFS) Framework in known and followed where relevant, at TPS.
- i) ensure all staff, Trustees and volunteers have annual face to face training
- j) ensure all staff, Trustees and volunteers complete the agreed Educare online training module including (but not limited to) Safeguarding, Prevent, Online Safety training modules
- k) ensure all staff, Trustees and volunteers read and understand the latest government guidance (for example KCSiE), as appropriate to their role
- l) ensure all new staff, Trustees and volunteers are provide with the following during induction training:
 - the school’s Safeguarding Policy, including the policy and procedures to deal with peer-on-peer abuse and information about the identity and role of the DSL and any deputies
 - the Staff Code of Conduct
 - the Raising a Concern at Work ‘whistleblowing’ Policy
 - E-Safety Policy and E-Safety Acceptable Use Policy (online safety)
 - Student Behaviour Policy
 - Cyber Bullying Policy
 - Counter Bullying Policy
 - the school’s procedure for children who go missing from education
 - a copy of Part 1 of *KCSiE* or Annex A if appropriate

Information sharing and managing the child protection file

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

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

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

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

Reporting

- a) The DSL and DDSL’s will meet at least half termly to discuss specific safeguarding concerns/cases, as well as focused discussions on specific safeguarding guidance e.g. online safety, peer-on-peer abuse and minutes/a report will be available

- b) The DSL will meet at least termly with the Nominated Safeguarding Trustee and a report will be available
- c) The DSL will meet annually to complete a Safeguarding Audit with the Nominated Safeguarding Trustee and a report will be available

DSL Training

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

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

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

Hours of work

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

Child Protection

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

Data Protection

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