

# SAFEGUARDING POLICY

<p><b>Policy Owner</b> PPS DSL's</p>	<p><b>Applies to</b> Prior Park Schools (Trust wide)</p>	<p><b>Superseded documents</b> Child Protection Policy v2</p>
<p><b>Associated documents</b> All PPS Associated Safeguarding Policies and schools specific Policies</p>	<p><b>Review frequency</b> Every year (unless the legislation/regulations update before this time)</p> <p><b>Implementation date</b> 1 September 2021</p>	<p><b>Legal Framework</b> DFE KCSIE 2021 See 1.4 below for detailed list</p>

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*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 has been approved by the two Safeguarding Trustees and has been approved and formally ratified by all Trustees on 17 September 2021.*

## 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)
  - Relationships 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](http://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 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, 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.

## **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 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 (see Appendix 7). 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)**

- 3.1 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: Simon Cane-Hardy (Deputy Head Pastoral) 01225 835353, Mobile: 07584 016050

Deputy DSL:

Izzy Burton (AH Intervention)

Melanie Gittins (Lead Nurse) 01225 831019 Mob: 07584 016123

David Sackett (AH Wellbeing)

Emma Wickham (Head of Compliance)

#### The Paragon School (TPS)

DSL: Mrs S James (Assistant Head, Pastoral) 01225 310837 (Mobile: 07584 016065)

Deputy DSL:

Justin Ryan (Deputy Head)

Emily Murphy (Key Stage 1 Lead)

Gareth Millar (Key Stage 2 Lead)

#### 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.

### 3.2 The DSL:

- Must receive updated Child Protection training on a biennial basis. This will include local inter-agency protocols and training in the BCSSP's online safety and Prevent duties. This is supplemented by regular attendance at the BCSSP's forum meetings, other training on specific safeguarding issues and e-bulletins. The required training content for the DSL is set out in Annex B of KCSIE and covers inter-agency working, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children. The Deputy DSL is trained to the same level.
  - Ensures that all staff receive the current version of Part 1 or Annex A of KCSIE: Teaching staff, who work directly with students, will read Part 1.
  - Student facing support staff will also read Part 1.
  - Non-teaching staff will read the condensed information in Annex A.
- All staff will be required to sign that they have read and understood the guidance. This applies to incoming and existing staff.
- Ensures that staff are supported to understand and discharge their role and responsibilities as set out in Part 1 of KCSIE.
- Has responsibility for online safety.
- Ensures that the Head and all staff including Trustees receive appropriate training, regularly updated, in line with advice from the BCSSP (Prior Park College and The Paragon) or the Gibraltar Care Agency (Prior Park School Gibraltar). Safeguarding training for staff includes information on Child Protection, identifying abuse, interagency working and local agreed procedures. All staff receive Prevent awareness training concerning the risks of radicalisation and how to identify children and young people at risk. Staff training includes online safety. This regular, formal training for staff is supplemented with informal updates; for example, at CPD days, in staff meetings and via staff bulletins. These are as required but at least annually.
- Ensures that all staff, temporary staff and volunteers receive safeguarding children induction training (within seven days of the commencement of their work at the school)
- Ensures induction training will include talking through the Prior Park Schools' Safeguarding Policy, the Prevent Duty, the Staff Code of Conduct, the School's Behaviour Policy, the Acceptable Use Policy for technology and the Trust's Whistleblowing Policy. In addition, the identity and roles of the DSL and the Deputy DSL are defined and the safeguarding response to children who go missing from education is explained. Copies of the above documents, together with Part 1 of KCSIE (and Annex A where applicable), will be given to all staff, temporary staff, Trustees and volunteers and signed to confirm receipt and that it has been read and understood. A risk-based approach is taken to the level of information given to temporary staff and volunteers.
- Ensures that the school operates within the legislative framework and guidance, consistent with the stipulations of the Bath & North East Somerset Local Safeguarding Children Board or the Gibraltar Child Protection Committee.
- Must inform the Bath & North East Somerset Community Safety and Safeguarding Partnership (BCSSP)- (HMGoGDO in Gibraltar). Please note that the DSL may contact the BCSSP for information or to discuss borderline cases, and this can occur without specific names or identification. The key thing is to consult and seek effective inter-agency co-operation.
- Must develop effective working relationships with other agencies and services, liaising and working with Children's Services over suspected cases of child abuse.
- Ensures accurate safeguarding records (for individual children) are taken. These will 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.

- Safeguarding records will be kept separately in a secure place, marked 'Strictly Confidential' and are passed securely should the child transfer to a new school.
- Ensures child protection records are sought from feeder schools.
- Must participate in any child protection conferences and contribute to delivery of action to safeguard the child.
- Must monitor children about whom there are concerns, being aware of any children missing from education and notifying Children's Services where there is an unexplained absence for more than two days for a child subject to a child protection plan.
- Will consider wider family and environmental factors and ensure that when information is shared staff consider what else they know about the context the child or young person lives in.
- Will act as a source of advice and support within the school, co-ordinating action, regarding referrals in relation to both children and allegations against staff.
- Will liaise with the Governing Body with appropriate reporting, review and discussion throughout the year.

### 3.3

The DSL acts to:

#### 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).
- d) the Headteacher to inform of issues, especially enquiries under Section 47 of the 1989 Children Act and Police investigations. The DSL acts as a source of support, advice and expertise to staff on matters of safety and safeguarding, and when deciding to make a referral by liaising with the relevant agencies.

#### Training

- a) Ensure that regular formal safeguarding training for staff, provided at least annually, is supplemented by informal updates.
- b) 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.

#### Raise Awareness

- a) Ensure that policies are known and used appropriately.
- b) Review Safeguarding Policy and update accordingly, working with the Governing Body.
- c) Link with the BCSSP/HMGoGDO to make sure staff are aware of training opportunities and local policies.
- d) Ensure student files are sought from and supplied to other schools in an appropriate manner.
- e) Ensure National Minimum Standards for boarding are known and followed where relevant.

#### 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. Also appreciate that elements like bullying and inappropriate behaviour may have deep impact, 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 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.

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 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](mailto: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:

### 1. Allegations that may meet the harms threshold.

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.

### 2. Allegation/concerns that do not meet the harms threshold, hereafter referred to as 'low level concerns'.

A low-level concern does not mean that it is insignificant, it means that the behaviour towards child does not meet the threshold of an allegation. "A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- 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.

#### 5.1 An allegation is any information which indicates that a member of staff (including supply staff)/DSL/volunteer/Headteacher 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.

#### 5.2 To reduce the risk of allegations all staff should be aware of safer working practice and adhere to guidance in the staff handbook and the Staff Code of Conduct. Additional information for staff can be accessed in "Guidance for Safer Working Practice for those working with children and young people in education settings" (2015 by the Safer Recruitment Consortium, adapted from original DfE 2009 document).

#### 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 Headteacher without delay, who will inform the DSL. The DSL will keep the Headteacher 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 Headteacher 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 Headteacher should be referred to the Chair of Trustees. In the absence of the Chair of Trustees, the Vice Chair should be contacted. The Headteacher must not be informed - leave this to the Police/ BCSSP/HMGoGDO for action.
- 5.5 If an allegation is made against the DSL, then the Headteacher 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 Headteacher may require the staff member to relocate to a residence off-site, pending a full investigation.
- 5.7 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.
- 5.8 Should the Headteacher 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.
- 5.9 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](mailto:help@nspcc.org.uk)

## **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 lead safeguarding Trustee.
- 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 Headteacher.

6.6 All Trustees must be able to identify the nominated DSLs and their deputies.

## **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 the DSL is designated safeguarding lead for the EYFS also.

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.

7.5.1 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.

7.5.2 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.

7.5.3 The grounds for disqualification are, in summary, that:

- I. a person is barred from working with children;
- II. they have been cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad;
- III. other orders have been made against them relating to their care of children;
- IV. they have had their registration refused or cancelled in relation to childcare or children's homes or have been disqualified from private fostering.

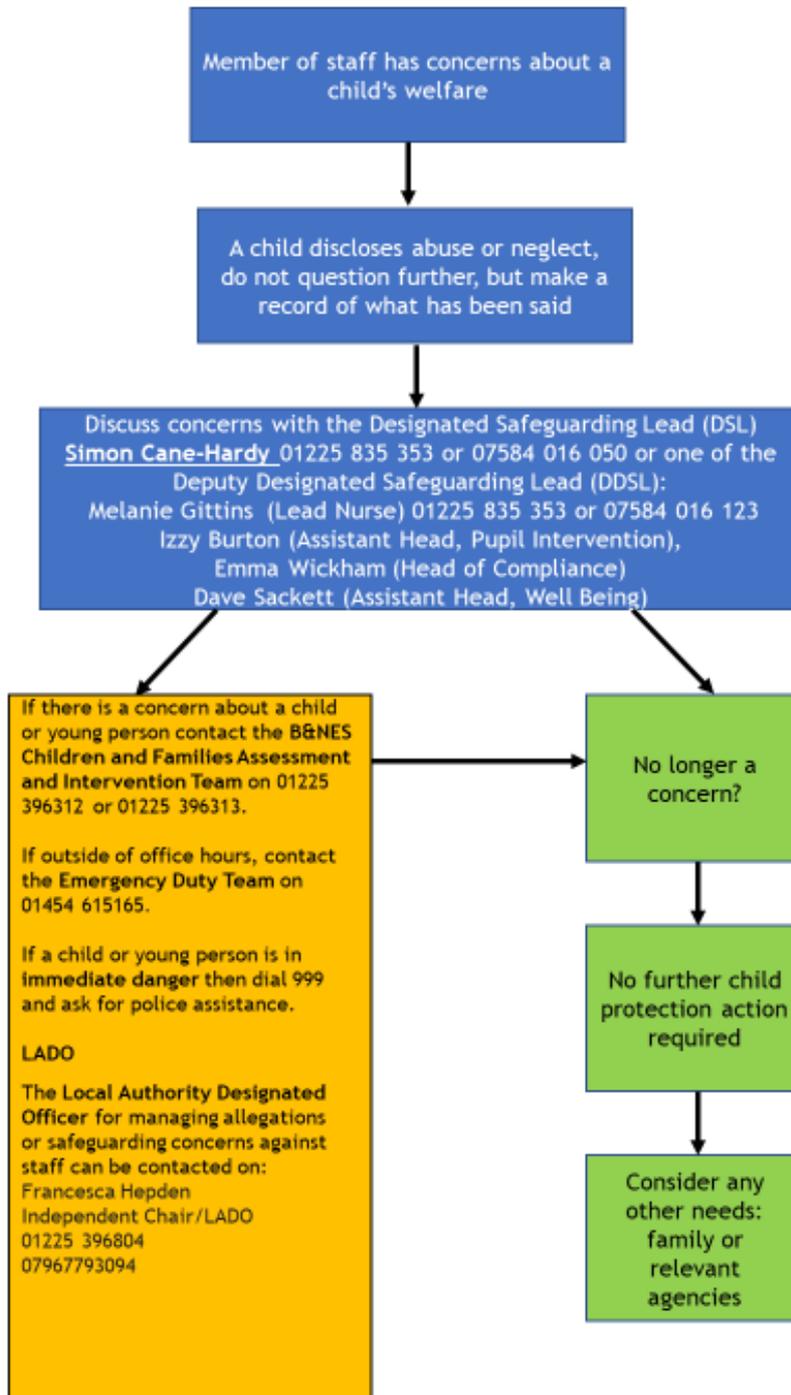
- 7.5.4 Schools may not employ people who are “disqualified” to work in these settings (7.5.3) or allow them to be directly concerned with their management.
- 7.5.5 Disqualification occurs as soon as the criteria in 7.5.3 are met (even before formal sanction is issued). Employees should inform the school of their disqualification immediately.
- 7.5.6 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).
- 7.5.7 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.
- 7.5.8 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.
- 7.5.9 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:
  - 7.5.10 Details of any order, determination, conviction, or other ground for disqualification from Registration under the Childcare (Disqualification) Regulations 2009
  - 7.5.11 The date of the order, determination or conviction, or the date when the other ground for disqualification arose
  - 7.5.12 Information about the body or court which made the order, determination or conviction, and the sentence (if any) imposed
  - 7.5.13 A certified copy of the relevant order (in relation to an order or conviction)
  - 7.5.14 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 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.

**APPENDIX ONE**

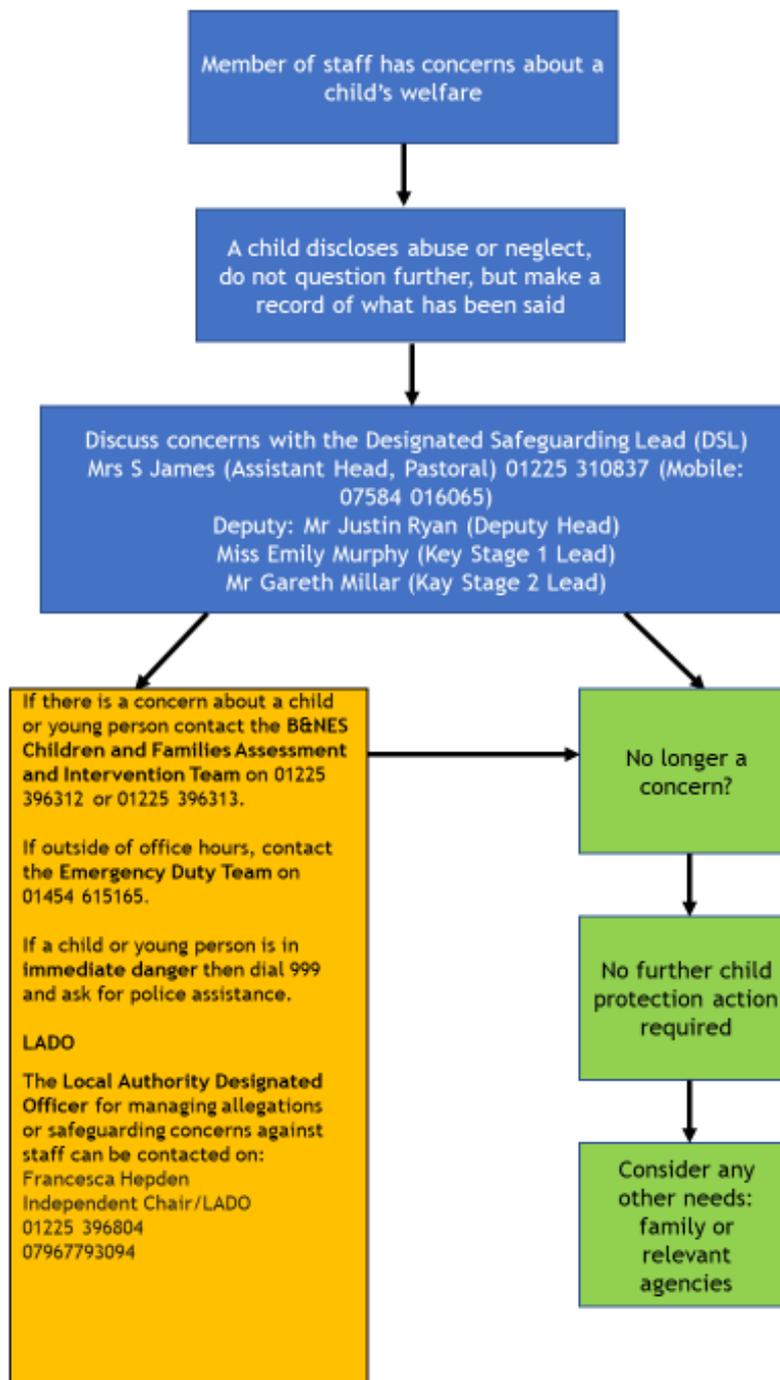
**BATH AND NORTH EAST SOMERSET COMMUNITY SAFETY AND SAFEGUARDING PARTNERSHIP  
Prior Park College**

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



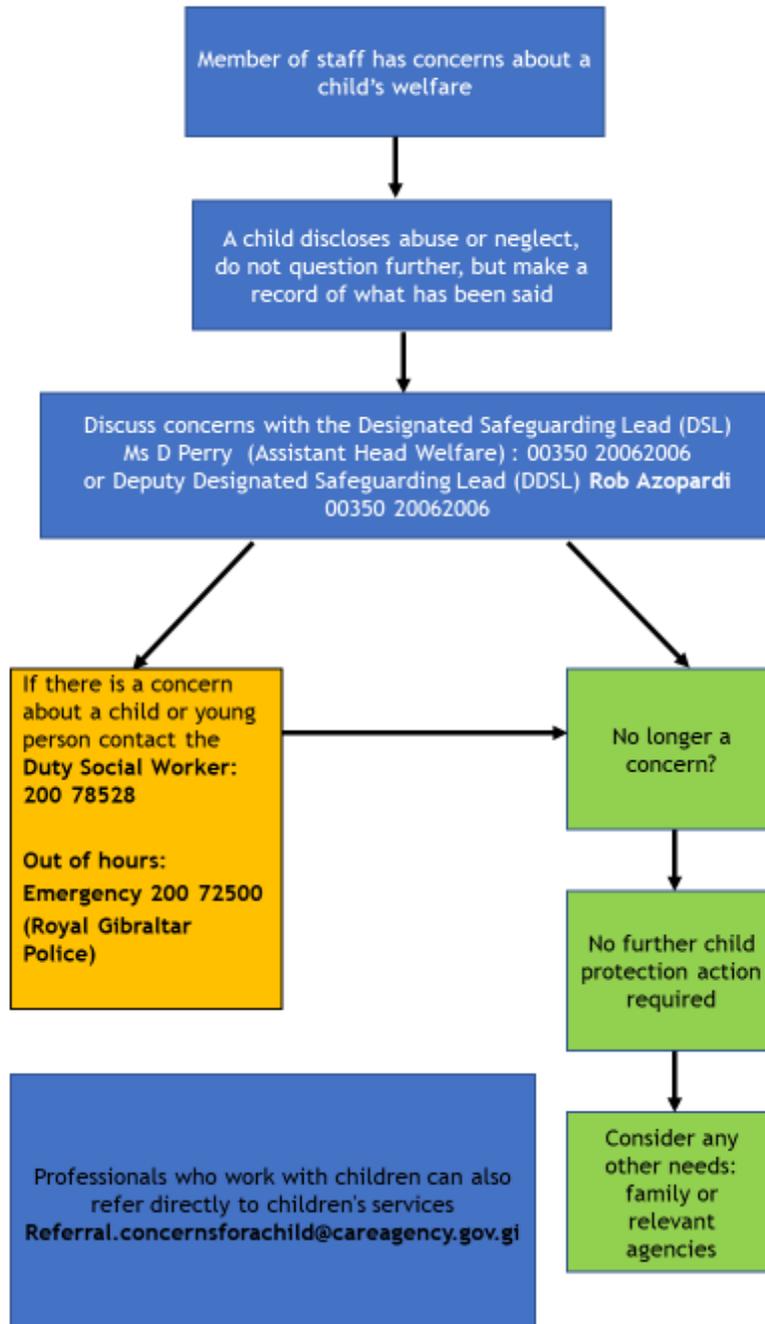
**BATH AND NORTH EAST SOMERSET COMMUNITY SAFETY AND SAFEGUARDING PARTNERSHIP  
CHILDREN BOARD  
The Paragon School**

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**

<b>Children</b>	Anyone who has not yet reached their 18 <sup>th</sup> 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.
<b>Safeguarding and promoting the welfare of children</b>	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.
<b>Child Protection</b>	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.
<b>Abuse</b>	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 (eg via the internet). They may be abused by an adult or adults, or another child or children.
<b>Physical Abuse</b>	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.
<b>Emotional Abuse</b>	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.
<b>Psychological Abuse</b>	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.
<b>Sexual abuse</b>	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>
<b>Neglect</b>	<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"> <li>• Provide adequate food, clothing and shelter (including exclusion from home or abandonment);</li> <li>• Protect a child from physical and emotional harm or danger;</li> <li>• Ensure adequate supervision (including the use of inadequate care-givers); or</li> <li>• Ensure access to appropriate medical care or treatment.</li> </ul> <p>It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p>
<b>Peer-on-Peer</b>	<p>Peer on peer abuse is most likely to include, but may not be limited to:</p> <ul style="list-style-type: none"> <li>•bullying (including cyberbullying, prejudice-based and discriminatory bullying)</li> <li>•abuse in intimate personal relationships between peers</li> <li>•physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm</li> <li>•sexual violence, such as rape, assault by penetration and sexual assault</li> <li>•sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment</li> <li>•non-consensual sharing of nudes and semi nudes images and/or videos</li> <li>•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</li> <li>•upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm</li> <li>•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.</li> </ul>
<b>Online Safety</b>	<p>The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:</p> <p><b>Content:</b> 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><b>Contact:</b> 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><b>Conduct:</b> personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit</p>

	<p>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><b>Commerce:</b> 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>
<b>Young carers</b>	<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>

## 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 contacts/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.

## **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 ‘it 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](mailto: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](mailto: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.

## **Voyeurism (Offences) Act 2019**

This legislation criminalises the act of ‘upskirting’. The Criminal Prosecution Service (CPS) defines ‘up skirting’ as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

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

## **Safeguarding Education: Online Safety & Relationship 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 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).”

## 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 Headteacher 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 Headteacher 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 Headteacher informs the Chair of Trustees, Safeguarding Trustee and Chair of LGC of the situation. If the allegation concerns the Headteacher, 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 Headteacher 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. 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**
**Staff Suitability Self-Declaration Form**

*This form is to be completed by all eligible existing employees and as part of pre-employment checks for new employees. This declaration needs to be completed annually.*

*Please respond to the questions listed below and sign the declaration to confirm that you are safe to work with children. If you are unable to meet any of the following aspects, please disclose this immediately to the Designated Safeguarding Lead in your school. Please circle “yes” or “no” against each point.*

*Please note that you must provide details of all convictions, including those regarded as “spent”.*

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

Have you been cautioned, subject to a court order, bound over, received a reprimand or warning or been found guilty of committing any offence <b>since the date of your most recent enhanced DBS disclosure?</b>	Yes	No
Have you been cautioned, subject to a court order, bound over, received a reprimand or warning or been found guilty of committing any offence <b>either before or during your employment at this school?</b>	Yes	No
Are you 'Disqualified from Caring for Children'?	Yes	No
Have you committed any offences against a child (at home or abroad)?	Yes	No
Have you committed any offences against an adult (e.g. rape, murder, indecent assault, actual bodily harm, etc. at home or abroad)?	Yes	No
Have you been barred from working with children (DBS)?	Yes	No
Have your own children been taken into care?	Yes	No

Have your own children ever been the subject of a child protection order?	Yes	No
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If you have answered “yes” to any of the above, please provide further information below (please refer to point 7.5.11 of the Child Protection Policy for guidance):

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**Employee's declaration**

I understand my responsibility to safeguard children, and I am aware that I must immediately notify the Designated Safeguarding Lead in my school of anything that may affect my suitability to work with children.

I will ensure that I immediately notify the Designated Safeguarding Lead of any convictions, cautions, court orders, reprimands or warnings I may receive.

**Signed** .....**Date** .....

Please record follow-on action taken, where relevant.

**Signed** .....**Date action taken** .....

**APPENDIX SEVEN****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)

Deputy: Mr Justin Ryan (Deputy Head)

Miss Emily Murphy (Key Stage 1 Lead)

Mr Gareth Millar (Key Stage 2 Lead) 01225 310837

***Prior Park College***

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

Deputy:

Izzy Burton (AH Intervention)

Melanie Gittins (Lead Nurse) 01225 831019 Mob: 07584 016123

David Sackett (AH Wellbeing)

Emma Wickham (Head of Compliance)

School Counsellor: Mrs J Robertson: 01225 330096 / email: [counselling@priorparkschools.com](mailto: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](mailto:pfelices@priorparkschools.com) or [patsy.felices@gmail.com](mailto:patsy.felices@gmail.com)

**For all Prior Park Schools**

Chair of Trustees: Mr John Shinkwin

Vice Chair of Governors: Ms Anne Shepherd

Safeguarding Governor: 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](mailto: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](mailto: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](mailto:hester_edmond@bathnes.gov.uk)

**EYFS: Ofsted**

Pre-School @MPS

t. 0300 1231231

e. [enquiries@ofsted.gov.uk](mailto: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](mailto: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](mailto: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

Focus Counselling (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.