



## **Job Description: Premises Manager**

Reporting to: School Business Manager/Headteacher

Responsible for: Caretaker, cleaning contract, and other external contractors.

Salary: Grade 8: Scale point 26 to 28: £40,182 to £42,060

Hours of work: 36 hours per week. 52 weeks per year. 29 days annual leave

### **Job Purpose:**

The Premises Manager is responsible for the effective management, maintenance, safety, and security of the school site. The role ensures that the school's buildings, grounds, and facilities provide a safe, secure, clean, and well-maintained environment that supports teaching, learning, and the wider life of the school.

The post holder will play a key role in health and safety compliance, statutory checks, site development, and the day-to-day operational running of the premises, with responsibility for managing the premises budget.

### **Key Responsibilities:**

#### **Site Management and Maintenance**

- Oversee the day-to-day management of the school premises, including buildings, grounds, and external areas.
- Ensure the site is clean, safe, secure, and well presented at all times.
- Carry out routine inspections of the premises and grounds, identifying and addressing maintenance issues.
- Undertake basic repairs, maintenance, and DIY tasks where appropriate.
- Arranging for other repairs to be carried out under the building maintenance contract, organising emergency response to vandalism damage and high-risk systems such as the school's fire and security alarms
- Manage planned preventative maintenance schedules.
- Ensure efficient operation of heating, lighting, water, and other building systems.
- Checking that the premises are at the correct temperature at designated times and that adequate hot water is available, monitoring and taking appropriate action where necessary
- In liaison with the Line Manager, arranging and overseeing alterations, redecoration, building and maintenance works and specialised repair work, and reporting on the progress made
- Maintaining a location plan of all turn valves or switches for utilities, ensuring clear access and good working order
- Ensuring drains and gullies are free flowing and clean
- Removing snow and other obstructions from main entrances, steps, paths etc maintaining adequate stocks of salt and sand
- Preventing unauthorised/unsafe parking on the school site.

#### **Health, Safety, and Compliance**

- Act as the school's lead for premises-related health and safety matters.
- Ensure compliance with all relevant health and safety legislation and guidance.

- Manage and monitor statutory inspections and servicing (e.g. fire alarms, emergency lighting, asbestos, legionella, gas, electrical testing).
- Maintain accurate records of health and safety checks and compliance documentation.
- Support the completion and review of risk assessments related to the premises.
- Ensure safe systems of work are followed by staff, contractors, and visitors.
- Safe storage, handling, and disposal of chemicals
- Ensure COSH compliance and risk assessments
- Ensuring staff and contractors follow safe practices when using hazardous substances
- Support and contribute to regular health and safety audits, inspections, and action plans

### **Security and Safeguarding**

- Ensure the security of the school site, including opening and closing procedures.
- Monitor access to the site during the school day and for out-of-hours use.
- Manage alarm systems, CCTV, and key-holding arrangements.
- Respond appropriately to emergency situations, including fire alarms, security breaches, and site incidents.
- Support the school's safeguarding culture by maintaining a safe physical environment.

### **Staff and Contractor Management**

- Line manage site and premises staff, including caretakers and cleaning teams, where applicable.
- Manage and monitor the school's cleaning contract, ensuring agreed standards of cleanliness, performance, and value for money are consistently met.
- Liaise regularly with cleaning contractors to agree schedules, specifications, and performance expectations.
- Monitor cleaning performance and address any issues promptly in line with contract requirements.
- Supervise and coordinate external contractors, ensuring work is completed safely, on time, and to an acceptable standard.
- Ensure contractors comply with safeguarding, health and safety, and site procedures.

### **School Vehicles and Transport**

- Oversee the maintenance, servicing, and compliance of school vehicles (e.g. minibuses, vans), ensuring they are safe, roadworthy, and fit for purpose.
- Ensure vehicles meet all legal and safety requirements, including MOTs, servicing, insurance, and inspections.
- Maintain accurate records relating to vehicle checks, servicing, and documentation.
- Ensure appropriate systems are in place for vehicle use, daily checks, and reporting of defects.

### **Facilities and Lettings**

- Support the management of school facilities for events, and lettings.
- Prepare rooms and spaces for school activities, including furniture layouts and equipment.
- Oversee site arrangements for parents' evenings, performances, and community use.
- Ensure facilities are secured and restored following events.

### **Budget and Procurement**

- Assist with the management of the premises and maintenance budget.
- Source quotations and place orders for repairs, equipment, and services.

- Monitor expenditure and ensure value for money.
- Advise senior leaders on premises priorities and longer-term site development needs.

#### **Environmental and Sustainability Responsibilities**

- Promote efficient use of energy and resources across the school site.
- Monitor utilities usage and report issues or inefficiencies.
- Support sustainability initiatives, recycling, and environmentally responsible practices.

#### **General Responsibilities**

- Work flexibly, including occasional early mornings, evenings, and weekends, as required.
- Participate in training and professional development relevant to the role.
- Contribute positively to the ethos and values of the school.
- Undertake any other duties appropriate to the role as directed by senior leaders.

**Please read the Person Specification for this role which describes the essential requirements for the position.**



## Premises Manager PERSON SPECIFICATION

<b>Experience</b>	
Proven experience in premises, facilities, or site management	Essential
Experience of carrying out building maintenance, repairs, and inspections	Essential
Experience of managing staff and overseeing contractors at all levels	Essential
Experience of working to health and safety procedures and regulations	Essential
Experience in project planning and execution	Essential
Experience in monitoring and managing premises budgets and procurement of goods, contracts and other services	Desirable
Experience of managing sites in the education sector	Desirable
Experience of working with people with learning disabilities	Desirable
<b>Skills</b>	
Excellent interpersonal skills, particularly the ability to relate to young people, parents, colleagues and external agencies	Essential
Ability to monitor and evaluate procedures effectively	Essential
ICT proficiency, sufficient to maintain records and communicate effectively with School staff, Management, Governors and external stakeholders, e.g. good working knowledge of Microsoft office Excel, Word, Outlook email and other school-based systems	Essential
Ability to undertake and write Risk Assessments	Essential
Ability to plan strategically and be an efficient project manager	Essential
Ability to use initiative, and have well developed incisive analytical and problem-solving skills	Essential
Practical maintenance and DIY skills	Essential
<b>Knowledge and understanding</b>	
Current knowledge of site maintenance and development, and appropriate knowledge of H&S legislation and requirements	Essential
Relevant knowledge of GDPR regulations, e.g. in relation to management of the CCTV system	Essential
Sound working knowledge of health and safety legislation and best practice.	Essential
Understanding of statutory compliance requirements (e.g. fire safety, asbestos, legionella, gas and electrical safety).	Essential
Knowledge of site security and emergency procedures	Essential
Knowledge of the operation of heating, ventilating systems and common causes of malfunctions.	Essential
Knowledge and understanding of routine preventive maintenance	Essential
Knowledge of COSHH regulations, and experience of risk management in this area	Essential
Understanding of child protection issues	Desirable
<b>Qualifications &amp; Training</b>	
Good general level of education, including literacy and numeracy skills	Essential
Relevant qualification in premises management, building maintenance or health and safety or qualified by experience	Essential



Up to date First Aid at Work Qualification	Desirable
Relevant Health & Safety certification e.g. NEBOSH, IOSH Managing Safely	Essential
Basic training in one of the following: plumbing, building maintenance, heating systems, electrical maintenance	Desirable
Willingness to undertake relevant training related to health and safety, safeguarding, and site management	Essential
<b>Personal Qualities</b>	
Reliable, trustworthy, and conscientious	Essential
Flexible and adaptable approach to work	Essential
Ability to work as part of a team and build positive working relationships	Essential
Commitment to maintaining high standards of safety, cleanliness, and presentation	Essential
Willingness to contribute to the wider life and ethos of the school	Essential
<b>Safeguarding &amp; Suitability</b>	
Commitment to safeguarding and promoting the welfare of children and young people.	Essential
Willingness to undertake an enhanced DBS check and all required pre-employment checks	Essential
<b>Additional Requirements</b>	
Willingness to work flexibly, including early mornings, evenings, and occasional weekends	Essential
Physical capability to undertake the duties of the role, with reasonable adjustments as required	Essential



## **SAFEGUARDING AND CHILD PROTECTION POLICY 2024-2025**

**Name of School: Priory School**

**Tel: 020 8653 8222**

**Headteacher:**

Name: Julie Evans

Contact details: [headteacher@priorycroydon.org.uk](mailto:headteacher@priorycroydon.org.uk)

**Designated Safeguarding Lead:**

Name: Tyler Mitchell

Contact details: [tmitchell@priorycroydon.org.uk](mailto:tmitchell@priorycroydon.org.uk)

**Deputy Designated Safeguarding Lead:**

Name: Sarah Gough

Contact details: [flo@priorycroydon.org.uk](mailto:flo@priorycroydon.org.uk)

**Designated LAC teacher:**

Name: Jonathan Wiltshire

Contact details: [jwiltshire1.306@lgfmail.org](mailto:jwiltshire1.306@lgfmail.org)

**Chair of Governors:**

Name: Susan Powell

Contact details: [spowell77.306@lgfmail.org](mailto:spowell77.306@lgfmail.org)

**Nominated governors for safeguarding:**

1. Name: Hazel Samuriwo

Contact details: [hsamuriwo.306@lgfmail.org](mailto:hsamuriwo.306@lgfmail.org)

2. Name: Stephen O'Reilly

Contact details: [stephensperou@hotmail.co.uk](mailto:stephensperou@hotmail.co.uk)

**London Borough of Croydon**

**Local Authority Designated Officer (LADO):**

LADO: Steve Hall

Email: [steve.hall@croydon.gov.uk](mailto:steve.hall@croydon.gov.uk)

Tel: 0208 255 2889

Mob: 07825 830328

Assistant LADO: Jane Parr

Email: [jane.parr@croydon.gov.uk](mailto:jane.parr@croydon.gov.uk)

Tel: 0208 726 6000

Mob: 07985 590505

**MASH (Multi-Agency Safeguarding Hub):**

For child protection matters requiring discussion or immediate attention: Tel: 0208 255 2888 (9-5pm)

Out of Hours line: 020 8726 6400 (5pm-9am)

MASH Service Manager: Nina Chaudhry

Email: [nina.chaudhry@croydon.gov.uk](mailto:nina.chaudhry@croydon.gov.uk)

**Croydon Safeguarding Children Partnership (CSCP)**

Website: <https://croydonlcsb.org.uk/> [Safeguarding learning & development](#) Email: [CSCP@croydon.gov.uk](mailto:CSCP@croydon.gov.uk)

Tel: 0208 604 7275

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## **Purpose of the Policy**

This policy sets out how Priory School will meet its statutory duty under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and help them to achieve good outcomes. The School will achieve this by providing a safe learning environment and ensuring school staff have the skills and knowledge to take action where children need extra support from early help services or a social work service. 'Children' throughout this policy, refers to any young person ~~aged~~ under 18, although child protection and safeguarding processes in the school apply to students of all ages – please see the Safeguarding Adults Policy for students aged over 18. The School recognises its vital role in safeguarding school-age children and will co-operate with the Croydon Safeguarding Children Partnership to ensure joint working with partner agencies in order to improve outcomes for children in Croydon.

"Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes." Keeping Children Safe in Education 2024

See Appendix 1- Specific Areas of Responsibility

### **1. Prevention - Safeguarding at Priory School**

#### **1.1. Children with special education needs (SEN)**

Priory School is a secondary special school for students who have moderate to severe learning difficulties. Many students have associated complex behaviours and many students have a diagnosis of Autism Spectrum Disorder. All students have an Education, Health and Care Plan (EHCP).

"Children with special educational needs and disabilities (SEND) are more likely than other children to be abused or neglected. Sometimes this is because of high care needs, difficulties expressing their concerns or because they don't understand that what is being done to them is abusive." Safeguarding Network 2024

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Priory school recognises that for all Priory students there may be additional barriers to recognising and reporting abuse or neglect.

"These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between facts and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so." Keeping Children Safe in Education 2024 p.49.

Priory school makes the following commitment to minimise the impact of these barriers and ensure that all students are kept safe and access support at the appropriate time;

- Staff training emphasising specific needs of Priory School students and the requirement for staff vigilance and close liaison with the DSL or any deputies.
- All staff are encouraged to exercise professional curiosity and discuss all concerns with the DSL or any deputies.
- All staff working with students are familiar with individual communication needs and how to identify if something is wrong.
- Staff are skilled at developing close professional relationships with students and become adept at identifying subtle changes in presentation to enable recognition of issues that may indicate abuse.

## **1.2. Training for all school staff**

Safeguarding training (including online safety and roles and responsibilities in relation to filtering and monitoring) at Priory School is delivered in a variety of mediums at regular intervals throughout the academic year, these include face-to-face training sessions with the DSL or any deputies, virtual/online training, audio/video training as well as interactive quizzes and assessments. The training aims to always consider the context of the context of the school, with specific attention paid to the unique interface of risk that young people with disabilities are exposed to.

The Designated Safeguarding Lead and any deputies undergo training every two years.

Any changes in safeguarding process, protocol and guidance will be disseminated to all staff in a timely manner.

In addition to safeguarding training, staff at Priory receive a range of training to develop expertise in working with children with disabilities all of which contributes to a whole school safeguarding culture

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including MAYBO **Positive Approaches to Behaviour (Learning Disabilities)** training in conflict management and key staff are identified for training in safe use of restrictive physical skills in behaviour management.

The Headteacher and Designated Safeguarding Lead will ensure that staff have been asked to confirm in writing that they have received and read the following guidance and policies, so that they are fully aware of their role in safeguarding children, they are able to identify abuse and are able to fully implement policies by following procedures outlined.

- Keeping children safe in education 2024 Part 1
- Priory School Safeguarding policy
- Safeguarding Adults policy
- Staff code of conduct
- Positive Behaviour support policy
- Personal Care Policy
- Anti-Bullying Policy
- First Aid and administering medication policy
- Safer Internet Use policy
- Risk profiles and risk assessments

### **1.3. Training for governors**

**All governors** will be required to access “appropriate safeguarding and child protection (including online) training at induction which will be updated at least annually.

The training should equip governors to test and assure themselves that the safeguarding policies and procedures in place are effective and support a robust, whole school approach to safeguarding.

### **1.4. Teacher-led and curriculum support for children with a social worker**

Adverse Childhood Experiences (ACE) including those that might require support from social care may impact on children's academic attainment. As such, guidance suggests that teaching staff are kept abreast of information regarding children's social care involvement so that educational support can be adjusted to accommodate adverse impact.

At Priory, the Designated Safeguarding Lead and any deputies will keep a close dialogue with teaching staff about any safeguarding issues that could impact on learning and students fluctuating social care needs. Sensitive information will always be shared in-line with GDPR and on a need-to-know basis. Teachers are asked to contribute to provide updates for the following meetings; Child Looked After reviews, Child Protection Reviews and Core Group meetings, Adult Best Interests meetings, Child in Need meetings, Team Around the Child (or Family) meetings. Social workers are asked to attend and contribute to EHCP meetings.

At Priory, teaching staff are aware that all students have a unique combination of needs that usually meets threshold for social care support therefore requires these needs to be considered and accommodated in educational provision.

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The virtual school head and the designated teacher can provide advice and guidance for teachers of children with a social worker.

### **1.5. Safeguarding in the curriculum**

Priory school is committed to supporting students to overcome challenges they experience which may impact on their vulnerability to abuse. Through a broad education focused on, development of independence, communication skills, keeping safe and promotion of self-worth and wellbeing, we are working towards Priory students developing the skills to keep themselves safe and seek help from trusted practitioners as they mature into adulthood.

The school understands the importance of all students feeling listened to and any concerns that are raised by students either explicitly or through behavioural change, will be responded to promptly and with due consideration to the nature of the challenges that are faced by individual students.

Aspects of safeguarding that could put children at risk of harm are differentiated throughout the Priory curriculum in ways that are relevant and appropriate to the learning styles of students in each pathway.

- British Values
- Development of positive emotional wellbeing
- Relationship and sex education aims to develop students' awareness of safe and healthy relationships. This aims to include teaching at a level appropriate to learners level of understanding.
- Internet safety: All students will be made aware of the rules around using the internet safely and will receive close supervision whilst using the internet in school (see ICT acceptable users policy). Groups of Priory students who are considered more at risk from issues that present themselves online will access internet safety lessons throughout the school year.

### **1.6. Personal Care**

Some students at Priory School will require support with the administration of personal care. This support might include verbal or physical support to complete hygiene processes, changing of continence pads or support to shower or bathe in school. Priory School's Personal Care Policy (2023) adheres to guidance in section 15 of [Guidance for safer working practice for those working with children and young people in education settings February 2022](#) to ensure that all staff support with personal care in a safe and respectful way at all times.

The Priory School Personal Care Policy (2023) classifies personal care into two strands; Level One Personal Care and Level Two Personal Care. All students who require Level Two Personal Care have a Personal Care Plan which is shared with parents/carers and seeks their input and authorisation.

- Personal care requirements will be highlighted on each student's Ready to Learn document and for those requiring additional support, will be detailed in a student's Personal Care Plan and a written record of each time the personal care is provided to the student.
- Only staff that are well known to the student should be supporting with personal care.
- Staff should always communicate with the student about how they are going to support them, request consent from the student and be gentle and respectful, maintaining dignity for the student at all times.

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- Staff should always support students to be as independent as possible and enable the development of independence skills wherever possible.
- Typically, Personal Care Plans are reviewed annually and shared with class teams, parents/carers and where appropriate, the student. If it is felt a more frequent period of review is needed, the Personal Care Plan will reflect this.

### **1.7. Behaviour that challenges**

Some students at Priory school may engage in behaviour that can challenge others. All staff are required to read the Behaviour Policy, which outlines the many ways in which Priory students are supported to decrease incidents of challenging behaviour to improve quality of life, expand learning opportunities, social opportunities and improve relationships with others. Where required, students have a Behaviour Support Plan (BSP), which outlines specific strategies to support that young person, and individual students may be identified for input from the behaviour and learning practitioners alongside others in the professional team.

### **1.8. Use of reasonable force**

The use of Physical intervention should be considered within the wider context of other measures. These include establishing and maintaining good relationships with the student and using diversion, de-fusion and negotiation to respond to difficult situations.

As detailed in section 2.2, Priory School follows the structure of MAYBO, which is in line with the Restraint Reduction Network's training standards. The school has qualified MAYBO trainers in post who are able to train staff on induction or as part of an ongoing training cycle.

As part of a developing Behaviour Support Plan, Behaviour and Learning Practitioners working alongside the teacher will identify what planned physical interventions could be necessary, reasonable and proportionate for an individual student in foreseeable circumstances and these should be risk assessed.

Only staff who have been trained to MAYBO 3 can carry out a physical restraint hold, except in an emergency scenario (for example a fire) and it should be clearly documented what hold was used and for how long on CPOMS once the incident has occurred.

- The physical restraint should employ the minimum reasonable amount of force and be used for the shortest possible time
- It can be used as part of a planned response and should be stated in the RED section of a student's Behaviour Support Plan: when the intervention can be used and what hold is to be used. If any other holds are used during the incident, then this needs to be reported to the Senior Leadership Team as soon as possible and a written record uploaded on CPOMS.
- eParents should be immediately informed if their child/young person has been involved in an incident that resulted in physical restraint and the hold used and for how long should be reported.

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- Where a student has been physically restrained, they will be reviewed by a First Aider to assess their physical welfare. The outcome of the review will be logged and parents informed via Medical Tracker. There may be occasions when a student refuses First Aider review following restraint. Where this is the case, parents will be notified of the refusal as part of the initial report of physical intervention.
- As an unplanned response or an emergency intervention, this will be followed by consultation with the Behaviour Team in order to clarify the need for a full behavioural risk assessment and development of an appropriate support plan. Following this, updated Risk Profiles and Behaviour Support Plans should be in place as soon as possible and staff trained accordingly

### **1.9. Use of physical contact**

"The Department believes that the adoption of a 'no contact' policy at a school or college can leave staff unable to fully support and protect their pupils and students. It encourages Headteacher, principals, governing bodies, and proprietors to adopt sensible policies, which allow and support their staff to make appropriate physical contact"

Keeping Children safe in Education 2024 p.45

As a specialist educational provision for young people with complex needs, there are many occasions where positive touch is a helpful and necessary part of how students are supported at Priory.

Physical contact may be open to misinterpretation and so staff should think clearly and carefully before making contact with a student and be certain that they are informed enough to make a decision in their best interests. Inappropriate physical contact is likely to be viewed as a safeguarding concern and it is likely to trigger processes described in the section 'allegations against staff'.

Physical contact should always only be offered in the best interests of the student.

Examples of occasions where staff can use physical contact to support students are as follows:

- Implementation of a sensory programme written and overseen by Occupational Therapist
- Implementation of behaviour support strategies, written in collaboration with Behaviour Practitioners
- Implementation of complementary therapy by a trained Complementary Therapist only
- Support with personal care
- Physical support to safely prevent harm during incidents of challenging behaviour in line with MAYBO guidance

People with disabilities are also at increased risk of experiencing abuse. An essential aspect of education at Priory is to support young people to understand how to keep themselves safe. This can be encouraged by modelling, seeking consent and always respecting a student's wishes to disengage. As such it is essential that all staff only use physical contact with students when fulfilling the below criteria;

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- A student consents to the physical support using their preferred communication method. If a student shows any sign that they do not want the contact to continue, it should be stopped immediately (with the exception of physical restraint where there is risk of harm).
- The staff member is aware of all professional guidance for that specific student; **all professional guidance should be followed at all times** e.g. health care plans, occupational therapy plans.
- Staff members need to be confident that they have all of the relevant safeguarding information about a student and to follow guidance of the Designated Safeguarding Lead and any deputies where there may be additional vulnerabilities.
- Staff members should only be supporting students using touch if the student is **very** familiar with the staff member and has a trusting relationship with them (such that they can determine the student's wishes for them to cease if requested). The class teacher can advise about the student's perception of their relationship with the staff member.
- The staff member should provide verbal guidance and seek consent throughout the physical support.
- Physical support should remain completely professional at all times and staff should be able to refer to the rationale for providing physical support.

Any staff member who perceives that physical contact is being made inappropriately, should report to the Designated Safeguarding Lead/Head teacher immediately.

## 1.10. Mental Health

"Mental Health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation" Keeping children safe in education 2024 p.49

Priory school is committed to bolstering the emotional wellbeing of all students throughout all aspects of the curriculum, school ethos and culture. Staff are aware of the risks of Priory students developing mental health problems and are trained in addressing mental health concerns by attending to a range of possible contributing factors; communication systems, sensory needs, access to physical activity, access to social opportunities, access to positive and enjoyable activity.

Staff are trained to be vigilant to the changing emotional presentation of Priory students and to be aware that there is a possible safeguarding risk. Because of the complex emotional and behavioural presentation of Priory students, behavioural, emotional changes may be reported through behaviour recording systems. Through pastoral and safeguarding meetings, the behaviour team, therapists and pathway leads will alert the Designated Safeguarding Lead and any deputies to fluctuating emotional presentation and behaviour change, the team will then identify appropriate collaborative plans to address these concerns with due attention to possible safeguarding risk. Plans will consider how to collaborate with parents, families and other professionals to identify risk and to improve the

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mental health of students. Processes to support the mental health of Priory students are outlined in the mental health policy.

### **1.11. Working with parents and carers**

The School recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of students. This is especially important with students who have additional needs because of related communication difficulties and their level of dependence on staff for support.

Priory School will:

Make parents aware of the School's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on where necessary, by making all School policies available on the School website or on request.

Communicate with parents around any concerns that are raised in order to collaborate to develop effective, meaningful support plans for students.

Provide opportunities for parents and carers to communicate regularly with teaching staff and other professionals through home-school communication methods (Seesaw, email, telephone calls), parents' evenings, EHCP review meetings and any further meetings that are requested by parents, staff or social care teams.

Invite parents/carers to contribute to their child/young person's educational provision by eliciting views for annual EHCP reviews.

Ensure a robust complaints system is in place to deal with issues raised by parents and carers.

The pastoral and Family Liaison lead will provide advice and signpost parents and carers to other services and resources where students need extra support.

### **1.12. Early help**

Through safeguarding training, all staff are made aware of the importance of early help; they are trained to notice and report signs that families may benefit from additional support and are familiar with processes to raise concerns with the Designated Safeguarding Lead and any deputies who will take action to elicit further support from Early Help services as required.

Due to the unique needs of Priory students, it is frequently appropriate for Priory's Pastoral and family support lead to offer support to parents and families. The Pastoral and family support lead is familiar with the complex needs of young people with severe learning disabilities and how their service needs may differ. The pastoral and family support lead is familiar with local specialist services, and liaises closely with professionals throughout the borough to signpost and elicit support for families who need it.

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The eligibility criteria for Croydon's Children with Disabilities Social Care Team indicates that most Priory students meet the threshold for a tier 3 service because of their learning disability. As such, where there is a need for further support, most Priory students would be referred directly to the Children with disabilities team, however if the student does not meet the threshold for CWDT or where a family does not give consent for a referral, the Safeguarding team will consider a referral to Early Help.

Where the child is receiving an Early Help service, the School will work as part of the Team around the Child (TAC). If the School believes that outcomes for the child are not improving, consideration should be given making a referral for a statutory social work service.

#### **1.13. School closure (In relation to Health and Safety)**

The school will always adhere to the local and government guidelines to keep safe in the event of any health outbreak that poses significant risk to the health and safety of Priory students. The school will continue to seek advice and guidance from the appropriate authority to respond to any risk that is pertinent to Priory students specifically.

If the school is felt to be unsafe for any reason by the Headteacher or Local Authority, a decision may be made to partially or completely close. Parents/Carers will be informed of any decision made regarding temporary closure.

Should the school be required to partially or completely close due to health and safety issues, the safeguarding team will alert the relevant professionals in the child/young person's network and establish a system for regularly checking the welfare of the student and their parents/carers.

#### **1.14. Equality and The Law**

Keeping Children Safe in Education 2024 Part 2 sets out the legal requirements around safeguarding. These include: [The Human Rights Act 1998](#), [Equality Act 2010](#) (Including the Public Sector Equality Duty), [Equality and Human Rights Commission](#), as well as local multi-agency safeguarding arrangements.

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## **2. Response: Child protection and safeguarding procedures**

### **2.1. Definitions of Abuse (See Appendix 2)**

Through annual safeguarding training, all staff are made aware of indicators of abuse and neglect abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. Safeguarding training will encourage staff to reflect on the unique interface of complexities faced by children with disabilities and how vigilance to the below indicators is essential to protect children. If any of the below factors have been identified, staff should follow safeguarding procedures outlined below and report to the Designated Safeguarding Lead immediately.

The following definitions of abuse are set out in statutory government guidance and provide the framework for responding to risk to children.

Abuse and neglect are forms of maltreatment. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children and young people may be abused in a family or in an institutional or community setting by those known to them, or more rarely by a stranger.

#### **Physical Abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child.

#### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another
- Serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Exploiting and corrupting children.

Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

Sexual abuse includes abuse of children through sexual exploitation.

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Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under **Section 5 Sexual Offences Act 2003**.

Sexual abuse includes non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

## **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or Psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For more information about signs and symptoms of abuse please refer to:

- Appendix 1
- [What to do if you're worried a child is being abused](#)
- Keeping Children Safe in Education 2024 for a full definition of significant harm and the specific indicators that may suggest a student may be at risk of suffering significant harm.

## **2.2. Responding to disclosures**

Many children can experience challenges in disclosing about abuse, neglect or mistreatment for example, they might not feel ready or able to disclose abuse. Priory students have many further barriers to eliciting support, including communication difficulties (see section 2). It is essential that staff maintain professional curiosity and discuss any possible concerns with the Designated Safeguarding Lead or any deputies. Staff must respond sensitively to any disclosure and ensure the student feels as though the report is being taken seriously.

If a student discloses any concern to a member of staff that they are being abused, the member of staff should:

- listen to what is said without displaying shock, disbelief or judgement
- reflect back what you have heard using the child's language
- Staff should not ask leading questions, prompt the child where necessary with open questions – where, when, what, etc.
- staff can ask children if they have been harmed and what the nature of that harm was
- be clear about the requirement to pass on the information to the Designated Safeguarding Lead
- reassure the student that all action will be taken to help them and keep them safe
- reassure the student that what has happened is not their fault and that they were right to tell someone.

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For further guidance about responding to a disclosure about sexual violence or harassment, see part 5 of Keeping Children Safe in Education 2024.

### **2.3. Reporting a Concern**

Through induction, safeguarding training, wider training and appraisal processes, staff should have an awareness of how concerns may manifest in students with learning difficulties and respond to any concerns by reporting to the Designated Safeguarding Lead or any deputies immediately.

The school Safeguarding Team are most likely to have a complete safeguarding picture and therefore are the most appropriate people to decide on the next course of action.

Where staff feel uncertain about whether to complete a safeguarding report, they should always discuss this with a member of the safeguarding team.

Where there are concerns about a child's welfare, staff will:

- Act immediately by verbally reporting to the Designated Safeguarding Lead or a deputy.
- **The same staff member** should then complete a written safeguarding report on CPOMS.

Due to communication difficulties experienced by most Priory students, it may be difficult for them to raise a concern, explain how they are feeling or ask for help. This requires staff to be especially vigilant to indicators listed above and to consider how these indicators might manifest differently in students they are working with. Staff are encouraged to always act cautiously and report concerns even when they are unsure, this is to enable the school to take action to ensure that all Priory students are protected from harm.

If a student arrives at school with any injury, staff should report this verbally to the Designated Safeguarding Lead or a deputy immediately and then provide a written report using a body map on CPOMS as soon as possible. If there has been no explanation given for the injury from a family member or if the explanation does not fit with the injury seen it is likely that children's social care will be informed.

### **2.4. Response to a concern**

The DSL or deputy should respond to the report by considering information available to identify most appropriate next course of action. Assessments will be made with reference to [Croydon Safeguarding Children Partnership's guidance and thresholds information](#) (or the relevant local authority safeguarding partnership guidance), use of triangle assessment to identify contextual factors which may influence identification of possible risk of harm.

Due to the student profile of children/young people who attend Priory School, it may at times be necessary for the Designated Safeguarding Lead and/or any deputies to physically assess a student in response to a raised concern. This may involve looking at cuts/marks/bruises that are covered by clothing or in a personal area. Where this is the case, the Designated Safeguarding Lead or Deputy responding will be of the same gender, accompanied by a member of staff familiar to the student and the expectations of conduct will mirror those outlined in the Personal Care Policy (2023). Where clothing removal is required as part of an assessment, consent will be sought from parents/carers and documented on a student's safeguarding file. There may be occasions as part of the duty of care towards students and a necessity to safeguard, that a parent/carer may be informed following the assessment undertaken by the Designated Safeguarding Lead or Deputy. This should always be proportionate to the concern raised.

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Where required, the DSL or deputy will seek advice from the Multi Agency Safeguarding Hub (MASH) Professionals' Consultation Line to help make decisions around appropriate next course of action or directly from the children with disabilities team.

The MASH Professionals' Consultation Number is 0208 726 6464 (Monday to Friday, 13.00pm - 4.30pm).

Where a cause for concern is raised by a staff member that is not thought to meet the threshold to warrant a referral to children's social care, the Designated Safeguarding Lead may decide to respond to the concern internally and may take one of the following actions;

- Report the concern to an allocated social worker.
- Contact parents to discuss the concern and agree an internal support plan if appropriate. This may involve support from the pastoral and family support lead or other professionals in the school; teaching staff, behaviour support practitioners, speech and language therapist, occupational therapist.
- Organise multi-disciplinary meetings to address concerns involving external professionals e.g. NHS services.
- Request implementation of differentiated curriculum to address area of concern
- Monitoring of the child to identify if there is any further risk identified.

Every decision will be recorded on CPOMS and in the child's safeguarding file.

## **2.5. Referral to children's social care**

In response to a concern raised about a child that indicates that there is a possible risk of harm or signs or symptoms of neglect or abuse a referral will be made to children's social care. The decision to refer to children's social care should be made by the Designated Safeguarding Lead. There will always be a trained DSL onsite at any time. Where there is a safeguarding concern, staff should indicate to the DSL that there is an urgent requirement for the DSL to attend to the concern.

In the event that the DSL is not available, this should not delay any referral and any member of staff may make a referral if this is necessary. Staff should discuss the matter with a member of the senior leadership team and take advice from the MASH team social worker. The Designated Safeguarding Lead should be informed as soon as possible.

Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the Multi Agency Referral Form (MARF) within 48 hours.

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

If the child already has an allocated social worker, the referral should be made directly to them. If the child lives outside Croydon, a referral should be made to their home local authority.

If the School does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with children's social care via the Designated Safeguarding Lead.

See Appendix 3- Actions where there are concerns about a child.

## **2.6. Following a MASH referral**

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Where the referral raises concern that the child is at risk of significant harm, Croydon's MASH team will begin to gather relevant information from other agencies.

MASH will inform the School of the outcome of any referral and what action children's social care will be taking. This may include any of the following:

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These children (including disabled children) are unlikely to meet a reasonable standard of health and development unless provided with services. This assessment may be completed by the children with disabilities team and a care package may be provided.
- Convening a **strategy meeting** under **child protection procedures** for any child where there are concerns about significant harm, or taking any immediate action in order to protect the child.
- Providing interim services for the child and their family in the meantime whilst work is on-going (including details of appropriate services).

## **2.7. Significant Incidents**

The school will follow local guidance and report any significant incidents or parental complaints about safeguarding process to the local authority.

## **2.8. Role of the school in child-in-need and child protection processes**

Staff will monitor attendance, welfare, physical and emotional presentation of students as required by Child Protection or Child In Need plans, in conjunction with the designated lead, and information will be shared with social care as required. The Designated Safeguarding Lead will notify the allocated social worker if there are any significant changes for example if the child is removed from the school roll, excluded for any period of time or goes missing.

A nominated staff member will attend Child Protection Conferences and Core Group meetings as required. This may be the Designated Safeguarding Lead or their deputy, a middle leader or class teacher. If no one from the School can attend, the Designated Safeguarding Lead will ensure that a report is made available to the conference or meeting.

Priory school will identify services that may be appropriate to support a student who has or is at risk of experiencing abuse or neglect. This may include referral to a therapeutic service available in school or providing opportunities to talk to trusted staff members.

The Designated Safeguarding Lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. Guidance available from the NSPCC should help the Designated Safeguarding Lead understand when they should consider calling the police and what to expect when they do.

## **2.9. Escalation**

In the event that the DSL, members of the senior leadership team or other professionals are concerned that actions taken are not sufficient to protect a child or young person and they perceive there to be additional risk to the child or young person, the school will follow procedures outlined in the [CSCP escalation policy](#).

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## **2.10. Non-collection of children from school**

Many Priory students will be transported to and from school by Croydon SEN transport services. Where there is difficulty accessing the transport that has been provided, it will be down to the family to arrange transport to school.

If there are changes to normal arrangements for transporting students to or from school, parents will be asked to provide the details of the person authorised to collect the child. The school will also ensure that it has the details of at least two people who can be contacted in an emergency in the event that the child is uncollected. Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual.

In the event that anyone who is not authorised to do so attempts to collect the child, the school will not allow the child to leave but contact the parent immediately. If a child is uncollected at the end of the school day, the school will follow the procedure agreed with children's social care:

- The school will try to make contact with the parent or other family members, and wait with the child until someone comes to collect them.
- The school will contact the MASH Professionals' Consultation Line to seek advice at 4.00pm if there are difficulties in contacting parents or other family members.
- If all possible means of contact have been exhausted and no contact can be made with the parent by 4.30pm, the school will contact MASH Emergency Duty Team and, if advised to do so, the police, who will arrange to collect the child or make arrangements for the child to be transported to the children's social care office.
- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child in the event that they are unable to do so.
- Where children are regularly uncollected or collected late, this should be discussed with the Designated Safeguarding Lead. If there are also child protection concerns, a referral should be made to children's social care via MASH.



### **3. Allegations against staff and Whistleblowing**

In the event that an allegation is made against a member of staff, agency staff or volunteer, the School will follow Croydon's procedures for managing allegations against a member of staff.

#### [The Management of Allegations against Staff who work with Children and Young People](#)

The Governing Board will appoint the Headteacher as the school representative for the purposes of the allegations procedures and who will directly link with the Local Authority Designated Officer for all allegations raised or delegate to the Designated Safeguarding Lead. A further staff member (who will be a part of the school's Senior Leadership Team) will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the head teacher; allegations against the head teacher will be referred to the Chair of the Governing Board.

Priory school is required to follow [London Safeguarding Partnership Procedures](#) which were altered in 2022 to mandate that all 'low-level' concerns are discussed with LADO and advice followed. See Priory school Low-Level concerns policy.

#### **3.1. Reporting a concern**

Anyone that has a concern that a staff member has behaved in a way that; has, was intended to or could have caused harm to a child or young person must;

- ensure that the child or young person is safe
- verbally report immediately to the Head Teacher or Designated Safeguarding Lead (if the concern relates to the Head Teacher, this should be reported to the chair of governors)
- complete a written report of the concern using the Safeguarding or CFC Staff slip on CPOMS
- not speak to the child, young person the member of staff or any other colleagues in respect of the allegation.

The DSL/Head teacher will:

- Determine if a child or young person has been harmed, if there may be an immediate risk of harm or if the situation is an emergency. In such a case the DSL/Head teacher will contact children's social care and if required the police immediately.

Before contacting the LADO, the DSL/Headteacher will:

- Conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:
  - If the individual in the school or college at the time of the allegations
  - Did the individual, or could they have, come into contact with the child

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- If there are any witnesses
- If CCTV footage was available

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

If an allegation is made that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college, the below process should be followed.

The harms threshold is met where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this may relate to behaviour outside of work. Consult with LADO over transferable risk assessment as required)

Any concern should be reported immediately to the Head Teacher or DSL who will report the matter to the LADO.

The LADO will decide where the threshold for investigation under child protection procedures is met and will make arrangements to coordinate activity. Once it is clear that the individual should be referred, this should occur without delay, so that an agreement can be made about immediate action and what information can and cannot be shared.

The Croydon LADO is **Steve Hall** **Telephone Number:** 020 8726 6000 Ext.84322

**E** **Mail:** LADO@croydon.gov.uk  
**Location:** 4th Floor, Zone F, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA

If an allegation is made that does not meet this harms threshold. This will may be considered a 'low level concern', which will be investigated and responded to following the process outlined in the low level, **concerns policy**. Priory school follows [London Safeguarding Partnership Procedures](#) which requires all 'low-level' concerns to be discussed with LADO and advice followed.

The LADO will advise about next steps. These may include:

- Identification of a 'case manager' to complete an investigation; this will usually be a senior member of school staff.
- Liaison with police and children's social care
- Where there has been significant harm to a child or perceived risk of harm, there may be a strategy discussion between LADO, children's social care and police.

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In deciding whether to take immediate action in respect of the member of staff against whom the allegation was made, it will be necessary to balance any ongoing risks to children, against the risks of alerting the member of staff in such a way that they may silence children, or destroy evidence.

### **3.3. Investigation**

In the event that the harms threshold has been met and the LADO advises that an investigation is required, a "case manager" will be identified to complete the investigation. The case manager will ensure that the guidance in Keeping Children Safe in Education 2024 is followed to:

- Ensure the welfare of all children and young people at all times and **this will be the prime concern in terms of investigating an allegation against a person in a position of trust.**
- Inventively seek alternatives to suspension through the process of the investigation unless the LADO objects based on information received from other services.
- Inform the staff member of decisions in writing
- Consider possible professional reputational to the staff member and minimise upheaval unless it is in students best interests
- Keep accurate, thorough and detailed records of all information gathers, decisions made and outcomes. These will be stored electronically on the staff member's HR file until and unless the decision is made that the allegation is malicious or false.
- Ensure that welfare support is offered to the staff member; ensure there is an effort to minimise stress for the alleged at all times; advise them to access a trade union, appoint a named representative to keep the person informed about progress of the case and provide access to counselling or medical advice where appropriate. Ensure the staff member is appropriately supported through the 'return to work' process.
- Inform parents or carers of the child or children involved as soon as possible. Consulting the LADO and where involved children's social care and/or the police on what information can be disclosed, only in relation to their child - no information can be shared regarding the staff member. Ensure they are made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.
- Maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered in line with The Education Act 2011 amended the Education Act 2002
- If allegations are found to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help & consider a referral to social care. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual in reference to the code of conduct.
- Follow guidance in Keeping Children Safe in Education 2024 regarding 'settlement arrangements' and resignation (p.103)
- At the conclusion of an investigation, with the LADO, review the circumstances of the case to determine whether there are any improvements to be made to the school's or college's procedures to help prevent similar events in the future

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### **3.4. Allegation outcomes**

The school will use outcome definitions outlined in Keeping Children Safe in Education 2024. The outcome and response will depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position, an individual should be suspended only if there is no reasonable alternative

### **3.5. Record keeping and references**

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference.

Records will be kept in line with guidance stated in Keeping Children Safe in Education 2024, which references Independent Inquiry into Child Sexual Abuse (IICSA), ICO.

Schools and colleges have an obligation to preserve records that contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Cases been found to be false, unfounded, unsubstantiated or malicious should also **not** be included in any reference.

Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

### **3.6. Whistleblowing**

The School fosters a culture of openness to ensure staff feel able to raise concerns relating to the safeguarding of children or poor practice within the school that may cause a risk to children. See Priory Whistleblowing policy.

The School recognises that there may be circumstances where staff and students feel unable to raise concerns or incidents of malpractice within the School environment.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or schools/colleges are failing to safeguard and promote the welfare of children. Where it is not possible to raise concerns within the School, staff and volunteers may report concerns to the following:

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a student;

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- The following numbers can be used where there are issues regarding the School's overall procedures around safeguarding
  - Croydon Council's confidential whistle blowing email address – [schoolwhistle@croydon.gov.uk](mailto:schoolwhistle@croydon.gov.uk)
  - the Ofsted whistle-blowing line on **0300 123 3155**
  - the NSPCC whistleblowing advice line on **0800 028 0285**.

The head teacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and students.

#### **4. Additional Safeguarding Issues and vulnerabilities**

The School is aware that some students may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, children's social care or other agencies in order to overcome problems or keep them safe. The list below outlines specific safeguarding issues or circumstances that may increase the likelihood of a child or young person experiencing abuse.

##### **4.1. Child Sexual exploitation and child criminal exploitation**

Both Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) is a form of abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 in sexual or criminal activity a) in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with male or female, adults or children and can be a one-off event or a series (see point 19 for further indicators of CCE).

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

##### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

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All staff are made aware through safeguarding training of the specific vulnerabilities that are linked with young people's exposure to a range of safeguarding issues including CSE and CCE (see Appendix 4)

All staff are aware through safeguarding training of the signs and symptoms of CSE and CCE and are required to follow child protection procedures if they have any concern that a child may be at risk of harm. The Designated Safeguarding Lead will respond by referring to MASH. [Child sexual exploitation – DfE guidance](#)

#### **4.2. Children who are absent from Education for prolonged periods and/or repeated occasions**

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

The school will act in line with Priory School attendance policy which is guided by Department for Education's [Working Together to Improve School Attendance](#), [Croydon's Children Missing from education local authority guidance](#) to act promptly to report any student that is missing from education to the local authority via referral form and MASH.

The attendance policy outlines a staged day-to-day response for students who are absent without contact from a parent; this includes attempts to make contact with the parent/carer and possible contact with other professionals in the network. After 10 consecutive days, a CME referral will be completed.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommend that Local Authorities, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. Priory School will notify or confirm notification of a parent/carers intention to relevant professionals and Local Authority in a timely manner.

#### **4.3. Poor school attendance**

All young people are entitled to receive an education. Where there is high levels of absenteeism, the school will act in line with the attendance policy and will, in the first instance, strive to support parents to improve school attendance.

Where there is persistent or severe absenteeism without evidence of medical need, the school will follow guidance outlined in the Priory Attendance Policy and [Working Together To Improve School Attendance](#). This may involve; liaison with social care, liaison with the local authority school attendance team, parenting contracts, fixed penalty notices or prosecution.

#### **4.4. Children who run away/go missing**

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Children running away or going missing from home or care can act as a vital warning sign of a range of possible safeguarding possibilities including; abuse, neglect, criminal and/or sexual exploitation including risk of being involved in county lines.

Priory students usually require high levels of adult supervision in order to keep safe as such, in liaison with parents, social care and the police would be informed immediately if any Priory student was not within the supervision of an appropriate adult. [Children who run away or go missing from home or care.](#)

#### **4.5. Domestic abuse and/or sexual violence**

Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. Children can be victims of domestic abuse by seeing, hearing, or experiencing the effects of abuse at home which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Some children may experience domestic abuse within their own romantic relationships.

Priory school will refer young people affected by domestic or sexual violence to MASH.

School staff are made aware through training of the signs and symptoms that a child or young person may be impacted by abusive relationships at home (See Appendix 1 - indicators of abuse) and should report any concerns to the Designated Safeguarding Lead or a deputy using child protection procedures.

Further advice and guidance can be obtained from Family Justice Centre- [FJC](#) who can be contacted by phoning their helpline of 0208 688 0100 or by emailing [fjc@croydon.gov.uk](mailto:fjc@croydon.gov.uk)

Specific guidance on adolescent to parent violence and abuse is published by the Home Office [Adolescent to parent violence and abuse \(APVA\)](#)

The school is registered with Operation Encompass which enables police to inform the Designated Safeguarding Lead of any incident of domestic abuse which the police have been called to prior to a student's arrival at school the following day.

#### **4.6. Prevention of radicalisation**

The School's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism. [Promoting fundamental British values as part of SMSC in schools](#)

Under Counter-Terrorism and Security Act 2015, the School also has a duty to refer young people on to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised. [The Prevent Duty](#)

Where a School has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or

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that a younger student may be at risk due to their parent's radicalisation, the School should make a referral to MASH using the MASH Safeguarding Referral Form.

Where there are concerns about radicalisation and a referral to Channel Panel is being considered, the School should discuss these concerns internally and consider external advice and guidance where necessary and appropriate.

The School Designated Safeguarding Lead should be consulted for internal advice on making a referral. Prior to making a referral the school may also speak to and get advice from their police schools officer (if they have one); the MASH Professionals' Consultation Line; and/or Croydon's Prevent Co-ordinator.

#### **4.7. Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)**

So-called 'Honour-Based' Abuse (HBA) encompasses incidents or crimes that have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. If risk of HBA is identified, child protection processes will be followed.

The School will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM: [Multi-agency statutory guidance on female genital mutilation](#). Where a student makes a disclosure of FGM, the School will follow the mandatory reporting rules and make appropriate referrals to the police and MASH using the MASH Safeguarding Referral Form. All concerns around FGM, including any disclosure made by a student, will be discussed with the Designated Safeguarding Lead before any action is taken. There is however, a legal duty on teachers to report any known cases of FGM in a person under the age of 18 to the police.

#### **4.8. Online safety**

Priory aims to educate students wherever possible and to ensure the appropriate supervision and support for parents is in place to keep Priory students safe online.

Pupils will be taught about online safety as part of the curriculum.

Students who attend Priory school all have learning disabilities in the moderate or severe range. Priory students experience a range of challenges in accessing ICT and the internet and as such, the potential risks posed by accessing the internet varies immensely across the school.

The ICT and PSHE curriculum addresses E-safety in a way that is heavily differentiated across pathways and for individual students based on a risk assessment of their needs, skills and associated risk they face online. The risk assessment includes a consideration of; ICT skills, their motivation to access the internet and the potential risks that may be present because of their skills and supervision requirements.

Class teachers (with support from the DSL, PSHE/RSE Coordinator or ICT Manager where required) can identify the specific risks that may be pertinent for individual students and develop lessons to address these risks.

For most students, online safety will be taught through the RSE/ICT curriculum however, teachers are provided with information about risks online and vulnerability factors to help them to identify those

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students who are deemed at greater risk online. Identified students will receive online safety interventions with the ICT manager in collaboration with parents.

All Priory students require levels of supervision that far exceeds their mainstream peers in order to keep them safe. As such, for all students, supervision when using the internet is the most important protection from risks online.

#### **4.8.1. Online risks and mitigation of risk through Filtering and Monitoring**

The breadth of issues classified within online safety is considerable, but can be categorized into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- 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'.
- 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; and
- Commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/> )

These risks are not all present for all Priory students because of differences in the way that students use the internet and technology. Class teachers will identify the relevant risks for students in their class and adapt teaching accordingly.

For those students who are able to access the internet, they will be encouraged to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies
- Where it is deemed appropriate according to student's capacity to understand these concepts students will be taught:
  - To use technology safely, respectfully and responsibly
  - To recognise acceptable and unacceptable behaviour
  - To recognise risks online and identify a range of ways to report concerns about content and contact
  - To keep personal information and identity safe online
  - That sometimes people behave differently online for example by pretending to be someone they are not.
  - That the same principles apply to online relationships as to face-to-face relationships e.g. being respectful.
  - The safe use of social media and the internet will also be covered in other subjects where relevant to specific student groups.

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- In the rare circumstance that a student brings their own phone or smart technology device into school, this will be handed to the class teacher and locked away securely for the duration of the school day, and will be returned to the student at the end of the day.

The London Grid for Learning (LGFL) provides and oversees the School's filtering and monitoring facilities. All school devices are closely monitored to quickly identify access to any inappropriate content and filter this effectively. The School undertakes the following responsibilities:

**The DSL oversees:**

- filtering and monitoring reports
- safeguarding concerns
- checks to filtering and monitoring systems

**The ICT Manager has responsibility for:**

- maintaining filtering and monitoring systems
- providing filtering and monitoring reports
- completing actions following concerns or checks to systems

**The Senior Leadership Team, Designated Safeguarding Lead and ICT Manager will:**

- procure systems
- identify risk
- carry out reviews
- carry out checks

#### **4.8.2. Supporting Parents with online safety**

In order to improve online safety for students outside of school, Priory will support parents in the following ways;

- Share individual risk assessments with parents which identifies areas of online risk and the focus of curriculum work in school to address these risks.
- Emphasise to parents the extent of risk online for certain groups who may be active online but who may not have the cognitive skills to keep themselves safe.
- Invite parents to attend annual parent groups around online safety and encourage exploration of individual students access to the internet and the skills required to keep themselves safe online.
- Sign-posting to resources, information and software to support with keeping students safe online outside of school.

#### **4.9. Looked after, previously looked after children and care leavers**

The School recognises that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

The School's Designated Teacher for CLA and care leavers has specialist knowledge of the issues faced by this cohort and for this reason, the Designated Safeguarding Lead will consult with the Designated Teacher to seek advice whenever there are concerns about the welfare of a looked after or previously looked after child or care leaver.

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The Designated Teacher will work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, Designated Teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

#### **4.10. Children at risk of forced marriage**

If the school becomes aware of a child that may be at risk of a forced marriage, they should in the first instance to MASH. If a child is at immediate risk, they should contact the police. Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit by phone 0207 008 0151 or emailing [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk) [Forced marriage - FCO Guidance](#)

#### **4.11. Privately fostered children**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent is a 'close relative' for 28 days or more. Schools have a legal duty to notify Croydon- or a student's respective local authority- of any students they know to be private fostered. The Designated Safeguarding Lead should refer to MASH any private fostering arrangements that come to their notice.

#### **4.12. Young carers**

If staff have concerns about a student they believe to be a young carer, they can contact the Young Carers Service on 0208 649 9339. This May be particularly relevant to siblings of Priory students. Families will be sign-posted to the young carers service as required.

Further details can be found on their website – [www.talkofftherecord.org](http://www.talkofftherecord.org)

#### **4.13. Risks posed to young people from within a wider community**

The School is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at School or from their own peer group. The Safeguarding team will be aware of these risks and consider them in assessments made about student's needs. The Safeguarding team will keep abreast of updates to [Croydon's Community Safety Strategy 2022-2024](#), and use this to inform referrals made and support provided.

#### **4.14. Young people at risk from gang activity or serious youth violence**

Schools are a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities. Priory supports young people with disabilities to develop communication and independence skills to increase resilience and reduce risk of gang or violent affiliation.

The police must be informed via 101 of any student found in possession or a weapon in school or any weapon that is found on the school site.



#### **4.15. Modern slavery and trafficked children**

County lines is when children and young people travel out of London to sell drugs on behalf of adults in those localities. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation. If staff become aware of child or young person who may be at risk, a referral should be made to MASH with the support of the Designated Safeguarding Lead. [Safeguarding children who may have been trafficked Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

#### **4.16. Working with aggressive and violent parents**

Where there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher/ principal and the Designated Safeguarding Lead and the information shared with children's social care. In the event of threats being made towards staff or physical aggression or violence by parents towards staff, incidents will be reported to the police.

#### **4.17. Alternative Provision**

The school remains responsible for the safeguarding of children of any students they place in Alternative Provision. Whenever the school places a student with an Alternative Provider, the school will obtain written confirmation of the provider's safeguarding and child protection policies and that all relevant vetting and barring checks on individuals working at the establishment have been carried out.

All students placed in Alternative Provision should be visited regularly- [Alternative Provision guidance](#)

### **5. Behaviour that occurs between children**

For the purposes of this policy, these safeguarding issues that may occur between peers have been grouped together.

- Bullying and child on child abuse
- Sexual violence and sexual harassment

The context of the Priory community presents its unique challenges in considering abusive behaviour between peers. Many students at Priory may be considered to lack the capacity to intentionally act in an abusive way towards others. However, there may be ways in which Priory students may be unintentionally impacted physically and emotionally by the behaviour of their peers.

This section of the policy identifies the definitions of each of the above safeguarding issues and considered how they impact Priory students and how the school aims to safeguard Priory students from outcomes linked with these issues.

Ensuring the physical and emotional safety of Priory students is the highest priority at all times. All staff strive to create a safe environment for all students, behaviour support plans and risk profiles are updated and used to address changing behavioural presentation to ensure that students are kept safe at all times.

The PSHE/RSE curriculum identifies areas of learning for all students around healthy relationships to prevent incidents of negative behaviour between peers.

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## 5.1. Bullying and Child-on-child Abuse

### Bullying: Definition

“Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms .....and is often motivated by prejudice against particular groups..... It might be motivated by actual differences between children, or perceived differences.” “Many experts say that bullying involves an imbalance of power between the perpetrator and the victim” [Preventing and Tackling Bullying 2017](#)

### Child-on-child Abuse: Definition

Children and young people can abuse other children and young people. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

### Bullying and child-on-child abuse at Priory

Priory School recognises that some of its students present behaviours that challenge which may include behaviour that verbally or physically affects those around them. All staff take action to ensure the safety of students at all times (see behaviour policy and safeguarding policy). These behaviours are considered to be a form of communication and although they may take the form of socially unacceptable behaviour or behaviour that might hurt others physically or emotionally, it is often not appropriate to consider this behaviour as bullying or abusive using the above definitions. Often behaviour that affects others is not repeated over time and does not appear to have intent.

In incidents of challenging behaviour where students have been impacted physically or emotionally by the behaviour of a peer, action would always be taken to provide support for students impacted (see below). Behaviour support plans and risk profiles are updated in-line with changing presentations to ensure that all action is taken to avoid physical or emotional harm to students by their peers.

Staff to student ratios at Priory vary from approximately 1:4 to 2:1. The increased supervision needs of Priory students and their requirement for support across settings, decreases the likelihood of any negative behaviour between peers becoming entrenched. It is more common that peers are supported through social interactions quickly and staff support is increased to prevent bullying or abusive behaviour from occurring.

However, it is possible that bullying or abusive behaviour between peers may occur at Priory.

Incidents of bullying or child on child abuse will be identified on one of the following ways:

- Student disclosure: Staff to report to the DSL
- Staff observation: Staff are trained to be aware of the signs/symptoms of bullying or abusive behaviour between peers and to report this to the DSL.
- CPOMS reports: Through analysis of CPOMS reports, the behaviour team identify any student that is persistently, acting in a way that could be considered abusive to another student and report this to the DSL.

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Young people who identify as Lesbian, Gay, Bisexual or Gender Questioning or who are perceived to be may be at greater risk of being targeted by other children, this includes, but is not limited to sexual violence, homophobic, biphobic and transphobic bullying. Staff should be aware of potential additional barriers faced by students who belong to this community and strive to reduce these.

### **5.2. Responding to incidents of bullying/abusive behaviour between peers**

- The young person who has been impacted by bullying or abusive behaviour will be supported by the most appropriate staff member (where possible, one that they choose) to provide space and time to talk or regulate.
- Parents/carers of both young people will be informed
- The DSL will work with parents and class staff to ensure that the student is kept safe. This may require liaison with external services such as social care or police and intensive support with both students to ensure that all parties remain safe.
- Where there is risk of further injury identified in school, documentation will be reviewed to ensure the safety of students in the short and long term. I.e. risk profiles and behaviour support plans will identify strategies to reduce risk to enable students to safety continue to access education.
- Strategies will be identified to work with the student who has engaged in the abusive/bullying behaviour to increase social understanding and support with reduction of behaviour moving forward (see below).
- The most appropriate support is identified for the 'victim'; this may be in the form of therapeutic support in school or additional support identified with services outside of school (see below).

### **5.3. Supporting students to reduce incidents of challenging behaviour**

Any student who engages in challenging behaviour that affects another student or staff member will be worked with through specific individualised strategies outlined in BSP to prevent further incidents (see behaviour policy). These strategies will consider possible motivation for behaviour and how to support to reduce this. In line with the behaviour policy, it is unlikely that sanctions will be used as a means to change behaviour but there may be action taken to ensure the safety of students in the future.

In addition the below will take place to reduce impact of challenging behaviour on peers:

- During incidents of physical challenge, staff will always engage in dynamic risk assessments to ensure that students in the vicinity are kept safe. This may require unplanned use of physical intervention. This will always be recorded in the incident report and overseen by the behaviour team and DSL.
- Risk profiles and risk assessments will be reviewed to ensure that there are identified strategies that sufficiently reduce the risk present to students impacted by others behaviour. This may require assessment for use of a physical intervention when there is risk of harm to others and/or moving students to ensure their safety.

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- Behaviour support plans will be reviewed to ensure that strategies are addressing changing behaviours to reduce prevalence of behaviour that can harm others.
- Where appropriate, for those who are able to, students will be offered a de-brief session to talk through the incident later in the day or at a later date to provide problem solving and reparation opportunities. This should only be done when the student is calm and able to reflect on the incident. Where appropriate visual tools used to support e.g. comic strip conversations.

#### **5.4. Supporting Students Impacted by challenging behaviour**

Whether or not behaviour is considered as having intent to harm another, it is important that any victim or any student impacted by challenging behaviour receive appropriate support.

Students at Priory are likely to be exposed to physically challenging behaviour at times and may be impacted by this. There may be occasions that behaviour may be directed at peers but is more likely to be directed at staff and witnessed by students.

Class staff, the behaviour team, therapy team and safeguarding team work together to consider the needs of all students exposed to this behaviour and how to support them to keep them safe.

- Any student who has been injured will access first aid by a trained staff member immediately, in extreme cases, further medical treatment will be sought.
- Parents will be informed immediately of any physical injury and will be informed that day if the student has witnessed behaviour that is likely to have impacted them.
- Students who have witnessed challenging behaviour should be offered 1:1, small group or whole class de-brief sessions. These are important to ensure that:
  - Challenging behaviour is not normalised
  - Difficult feelings are addressed and explored
  - There is an opportunity to regulate prior to accessing learning

On-going emotional support is offered where necessary via ELSA, allied therapists or by staff in the class.

#### **5.5. Harmful sexual behaviour, sexual violence and harassment**

It is important for all school staff to be aware that sexual abuse and sexual harassment between peers can happen at Priory school.

Priory recognises that sexual violence and sexual harassment between students is a serious safeguarding issue and such behaviour will not be tolerated. School behaviour management and anti-bullying policies will reflect the school's approach, and staff and students will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

The School will promote an environment where all students are encouraged and feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken

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seriously and thoroughly investigated by the School and appropriate referrals made to the police and children's social care.

### **5.6. Sexual abuse and Sexual harassment**

The definition of sexual violence, sexual harassment and harmful sexual behaviour is taken from Keeping Children Safe in Education 2024.

"Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable." Keeping Children Safe in Education 2024 p.111  
Staff should understand the importance of;

- A zero-tolerance approach to sexual abuse and sexual harassment
- Recognising the scale of SVSH and that it could be happening even if it is not being reported.
- Challenging any physical behaviour

### **5.7. Sexual violence**

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. The government guidance refers to sexual violence under the Sexual Offences Act 2014 and describes sexual violence as: Rape, Assault by penetration, Sexual assault or causing someone to engage in sexual activity without consent.

### **5.8. What is consent?**

Consent is about having the freedom and capacity to choose. Consent can only be given by someone who has the freedom and capacity to make that choice.

A child under the age of 13 can never give consent.

The age of consent is 16 for those who have mental capacity.

All Priory students have learning disabilities. Many Priory students have severe cognitive impairments that are likely to significantly impact their capacity to provide informed consent.

If it was reported that any Priory student was engaged in sexual activity (regardless of their age) with any other person, there is a high chance that this would be considered to be non-consensual and therefore abusive, as such should be treated as a safeguarding concern.

In the event that a student over the age of 16 expressed a desire to engage in sexual activity and/or was involved in sexual activity that was reportedly consensual, it would be necessary to ascertain if they have mental capacity to consent via a mental capacity assessment. This assessment will promote young person's independent decision making wherever possible but consider vulnerability to abuse/exploitation.

Further information about consent can be found here: <https://rapecrisis.org.uk/get-informed/about-sexual-violence/sexual-consent/>

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## **5.9. Sexual Harassment**

The below definition is taken from Keeping Children Safe in Education 2024

"For the purpose of this advice, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college."

Sexual harassment can include:

- sexual comments including making sexual remarks about clothes and appearance and calling someone sexualised names,
- sexual "jokes" or taunting,
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes
- and displaying pictures, photos or drawings of a sexual nature;
- and online sexual harassment, may include:
  - consensual and non-consensual sharing of nude and semi-nude images and videos;
  - sharing of unwanted explicit content;
  - receiving unwanted explicit content;
  - upskirting;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;
  - sexual exploitation;
  - Coercion and threats.

Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence."

## **5.10. Sexual Violence and Sexual Harassment at Priory School**

There are a number of factors which make child on child sexual abuse and harassment less likely to occur either in Priory school or outside of school. These include;

- Very high supervision ratios in school and on school transport
- Supervision requirements in all settings outside of school
- Reduced access to social media
- Reduced exposure to sexualised content online and between peers
- Significant communication difficulties.

Despite this, it is essential that all staff consider that it might happen at Priory and are vigilant to signs that students are being abused by their peers and be familiar with the processes to support students should this occur.

Some Priory students may have both the communication skills and the cognitive ability to engage intentionally in verbally or physically abusive behaviour towards peers, however existing staffing ratios and supervision requirements continue to mitigate risk of this occurring. The RSE/PSHE curriculum for these students should focus heavily on aspects relating to healthy relationships.

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All Priory students have a cognitive impairment and this often affects student's awareness of socially appropriate behaviour. This includes management of sexual development and it is fairly common for students to require significant support in understand how to safely manage sexual development (See PSHE/RSE Policy).

The most likely impact for Priory students is unintentional exposure to peers management of sexual development. If students are inadvertently exposed or influenced by a peer's management of sexual needs, the school would consider whether or not this may be termed as abusive and would decide on the most appropriate response for both parties.

### **5.11. Reporting and management of Sexual Abuse and Sexual Harassment**

- Any incident of sexual violence, sexual harassment or harmful sexual behaviour that is observed or reported to any staff member should be verbally reported immediately to the Designated Safeguarding Lead or a deputy.
- Verbal reports are essential to ensure that quick action takes place to keep the young person safe.
- The staff member will then be asked to record the incident through the safeguarding tab on CPOMS
- The DSL will assess the concern raised and will respond on a case-by-case basis. Possible actions may include:
  - Police involvement
  - Social Care referral – See Safeguarding Policy Section
  - Information gathering within school to assess risk to students
  - Consideration of how to keep all students safe within school;
    - If there is an on-going perceived risk, it may be necessary to consider internal or external suspension until students can be supported to reduce risk to peers onsite.
    - Implementation of appropriate support for both students with consideration of their individual learning needs.
- The DSL will inform the parents of the student/s who has made the disclosure or seen to be impacted by the behaviour of another and will discuss support plans.
- The DSL will inform the parents of the student/s who the allegation has been made about with suggested decisions/support identified.
- The DSL will identify the most appropriate way to support the student who has been impacted by another's behaviour. This may include:
  - Opportunities to speak with favoured staff members
  - Internal therapeutic support offered via allied therapists or support strategies offered by members of the therapy team.
  - Referral to external support services

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- Consideration of the need to move students where there are risks identified to specific individuals. This will always be done sensitively, ensuring that actions are not taken to 'punish' but to ensure safety.
- Increased support in RSE, safe relationships and 'speaking out' advocacy with the support of SALT as required.

## 5.12. Incidents of Inappropriate sexualised behaviour

- At Priory, due to cognitive impairment and challenges with social understanding, many incidents of inappropriate sexualised behaviour will not be directed at others but may unintentionally impact other students who may witness behaviour.
- Any incidents of sexualised behaviour that are not directed at another, should be reported to the DSL and a Cause for Concern form completed on CPOMS.
- An appropriate response will be determined:
  - Consideration of possible safeguarding risk to the student engaged in the behaviour and any possible witnesses
  - Consideration of appropriate intervention to support with development of appropriate management of sexual development
  - Support for any students that may have been witness to the behaviour

Any abuse that has occurred online and there is evidence of this either on a device or a print out, the DSL or another member of the Senior Leadership Team will securely remove the evidence and store it without viewing or sharing any images but hand to the police for inspection. [Searching, Screening and Confiscation](#)



## **6. Record Keeping, Information Sharing**

### **6.1. Keeping records**

Child protection and safeguarding records relating to students are highly confidential and are kept in a designated safeguarding file in the Designated Safeguarding Lead's office separate to the student's education records. These records will be securely held within the School. Electronic safeguarding records are stored in a secure drive on the school network and are only accessible by the senior leadership team and Safeguarding Team.

The Designated Safeguarding Lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.

The Designated Safeguarding Lead is responsible for ensuring relevant records are passed on appropriately when children transfer to other schools, either electronically or in hard copy (sent via recorded delivery) and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer.

### **6.2. Confidentiality and information sharing**

All sensitive and confidential information about a student will be shared within the school on a strictly need-to-know basis. This might be to enable staff to be alert to concerns and respond to keep a student safe, this might be to enable staff to adjust educational provision to ensure best outcomes for the student.

If it is considered necessary to share information about a student with professionals outside of the school, all GDPR processes will be followed. In most circumstances, consent will be gained from parents or individual students (if they are over 16 and deemed to have mental capacity to give consent) before sharing information with other professionals. Information will only be shared without consent if a lawful reason to share information has been identified. The Safeguarding Team and school staff will follow the guidance in [Information Sharing: Advice for practitioners providing safeguarding services for children, young people parents and carers](#) as well as being guided by the [Data Protection in Schools Toolkit](#).

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act 2005; otherwise consent should be sought from parents.

Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with children's social care and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by children's social care.

Parental consent to making a child protection referral should be sought, but if withheld, the referral must still be made and parents made aware of this. Before taking this step, schools and colleges should consider the proportionality of disclosure against non-disclosure; is the duty of confidentiality overridden by the need to safeguard the child?

Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the MASH Professionals Consultation Line on a "no names" basis to gain advice on whether this course of action should be taken.

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Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure, and remind recipients that the information is confidential and only to be used for the stated purpose.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with the Designated Safeguarding Lead or seek advice from the MASH Professionals Consultation Line.

## **7. Safer recruitment**

The School recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working in the School are suitable to do so, and do not pose any kind of risk to children.

The School will follow all safer recruitment guidance outlined in Keeping Children Safe in Education 2024

- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.
- Staff and governors who normally sit on interview panels will be trained in safer recruitment and no interview should go ahead unless at least one member of the panel has undertaken safer recruitment training.
- The Governing Board will ensure that they maintain an overview of recruitment systems in order to scrutinise practise and ensure all statutory checks are carried out.
- Staff in responsible for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.
- In Priory school, the Headteacher and Designated Safeguarding Lead with the day to day support of the Human Resources Manager or other relevant member of the Business Support team, will be responsible for keeping a single central record of all staff and volunteers (including governors) who work at the school. The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained.
- Where staff are recruited via third parties such as employment agencies, the school will:
  - seek written confirmation from the agency that the agency has carried out all necessary checks on the individual and the outcome
  - Have sight of the DBS for all agency staff and take note of the DBS no.
  - Check the identity of agency staff when they first present for work to ensure they are the person against whom the checks were taken out.

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## 7.1. Checks to be taken out

The School will carry out required checks and enquiries on applicants for all positions, including voluntary and support roles and governors, salaried trainee teachers and those involved in the management of an independent school, in accordance with statutory requirements.

The School will verify the following information for all new staff:

- The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided.
- The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted and its validity checked in the presence of the applicant.
- Staff from EU countries will no longer automatically have the right to work in the UK and this will need to be proven through the EU settlement scheme or a visa.
- Where the applicant will be involved in regulated activity, an enhanced DBS check will be taken out, including seeking information from the barred list.
- In the case of teaching staff, checks will be made on the applicant's academic and vocational qualifications and further checks made on Teacher Regulation Agency (TRA) Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order. Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach via the TRA Teacher Services system.
- Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role.
- Keeping Children Safe in Education 2024 recommends that education settings should conduct online searches as part of their due diligence.

Details on the '[Prohibitions of Teachers](#)' provides information on what the order prevents if there is a full or interim prohibition order.

A section 128 direction restricts the individual taking part in management of independent schools (including academies and free schools).

## 7.2. References

- Applicants will be asked to provide a full employment history and details of at least two referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References from colleagues / friends will not be acceptable.
- All references will be taken up prior to interview and will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided.

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- References will be taken up from current employer; if the applicant is not currently employed, verification of will be sought from their previous employment as to the dates the applicant was employed and the reasons for leaving the post.
- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.

### 7.3. DBS checks

In order to ensure that people who work in the School are suitable to do so and are not barred from working with children, the School will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

Full DBS checks which include barred list checks will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- teaching
- training
- supervising
- care
- guidance and advice
- driving a vehicle
- personal care

Full DBS checks with barred list checks will also be carried out on permanent staff members working at the School or unpaid volunteers who regularly work unsupervised at the School and whose work means they have an opportunity for regular contact with children.

Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but **not** barred list checks.

The School has robust procedures for day-to-day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

The School will ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure.

### 7.4. Volunteers and supply teachers

The Headteacher will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany students on school outings or provide help in the classroom:

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- All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews that is appropriate and proportional to the duties assigned to them.
- Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children should be subject to an enhanced DBS check, including barred list information.
- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check but this may not include a barred list check.
- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the Headteacher will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on:
  - the nature of the role
  - what information is already known about the volunteer
  - what references from work or volunteering activity the volunteer has provided regarding suitability
  - whether the role is eligible for an enhanced DBS check.
- The School will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualification and experience.
- Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of students.
- All volunteers will be fully inducted in relation to all school policies and procedures.

## **8. Health and Safety**

### **8.1. Responsibility for health and safety**

The Governing Board and Headteacher will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of students and staff within the school environment.

Any health and safety policy adapted by the School will be based on the government guidance (link below) and will seek to balance risk avoidance against providing students with opportunities to take part in activities that help them learn to manage risk themselves.

[Health and safety: Advice on legal duties and powers](#)

Day-to-day responsibility for health and safety issues in the school will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training.

### **8.2. Accidents in School**

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Where accidental injuries occur in school, first aid will be administered by trained staff as necessary and any further action taken to keep students safe.

Parents or carers will be informed as soon as possible and staff will report the accident on EVERY.

First aiders will keep a record of the first aid that they administered – see first aid policy.

### **8.3. Risk assessments**

The School will seek to identify and manage risk through the use of risk assessments.

Each student will have an individual risk profile, which will identify control measures to enable students to participate in activity that may otherwise pose a risk. The control measures will outline how the frequency or intensity of a risk is reduced.

Risk assessments will be completed for specific activities or parts of the premises within the school that may pose additional risks. These risk assessments will outline risk reduction measures and will be reviewed annually.

Staff are required to read the generic educational visit risk assessment prior to taking students offsite.

Location risk assessments will be completed for visits to any new venues or any locations that pose particular risks. Please see educational visits policy.

Risk assessments will be reviewed annually.

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## 9. Legislation and Guidance

The School will work to the following documents in order to support the protection of students who are at risk of significant harm. The School will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and ~~Working together to safeguard children 2018~~. Working together to Safeguard children 2023

- [Keeping Children Safe in Education 2024](#)
- [Working Together to Safeguard Children 2023](#)
- [Guidance for safer working practice for those working with children and young people in education settings February 2022](#)
- [Working Together To Improve School Attendance 2024](#)
- [What to do if you're worried a child is being abused 2015](#)
- [The London Safeguarding Children Board child protection procedures \(LSCB\)](#)
- [Croydon Safeguarding Board local policies and procedures](#)
- [Children Missing in Education \(DfE 2016\)](#)
- [Information Sharing; Advice and Guidance for practitioners providing safeguarding services to children, young people, parents and carers \(DFE-00128-2018\)](#)
- [Overshadowed: The mental health needs of Children and Young People with Learning Disabilities \(Children and Young People's Mental Health Coalition, 2019\)](#)
- [Child sexual exploitation – DfE guidance](#)
- [Safeguarding children who may have been trafficked](#)
- [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)
- [The Management of Allegations against Staff who work with Children and Young People](#)
- [Use of reasonable force in schools](#)

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## Appendices

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## Appendix 1

### Specific Areas of Responsibility

#### **The Headteacher, designated lead and safeguarding team will**

- Members of the safeguarding team are encouraged to attend learning events and participate in audit activity provided by the Safeguarding Children Board as well as promote published learning from events and serious case reviews.
- Safeguarding issues are brought to the attention of the governing body.
- The Headteacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- The designated lead, deputy designated lead or a member of SLT will be available during school hours for staff to discuss safeguarding concerns.

In addition to areas identified elsewhere in this policy, the Designated Safeguarding Lead (and their deputy) will:

- liaise with and manage referrals to relevant agencies such as CSSW, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS);
- keep the Headteacher and the board of governors informed of on-going safeguarding and child protection issues and enquiries;
- ensure the school's safeguarding and child protection policies are up to date and consistent with Croydon's Safeguarding Children Board policies and that policies are reviewed annually;
- attend regular training, including Prevent awareness training, and the designated teachers meetings hosted by Croydon and the Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices;
- School staff and governors will receive regular and timely updates on child protection and safeguarding issues via the Designated Safeguarding Lead in order to ensure they remain up to date with any changes in safeguarding/child protection new legislation.
- liaise with the designated teacher for LAC whenever there are safeguarding concerns relating to a looked after child or previously looked after child;
- Liaise with class teachers, support staff and therapists where appropriate to gather all necessary information to make an informed safeguarding assessment.
- oversee child protection systems within the School, including the management of records, standards of recording concerns and referral processes;
- attend Child protection conferences, Core group meetings, and child in need meetings to represent the role the school plays in the plans to support the child and share information as required to contribute to the development and monitoring of plans.

#### **Governing Board**

The Governing Board will ensure that the School meets its statutory duties with regard to safeguarding and protecting students and that the following are in place:

The School has the following policies in place and that these are regularly monitored, reviewed and updated where necessary;

- safeguarding policies and procedures covering early help and child protection that are consistent with Croydon Safeguarding Children Partnership procedures and Croydon's internal policies

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- a staff code of conduct policy including policies covering staff/student relationships and communications and staff use of social media
- A procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school is able to work jointly with other agencies in order to ensure students can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- The Chair of the Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher.
- A senior member of staff is appointed as the Designated Safeguarding Lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.
- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the School and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents and students are aware of the School's safeguarding and child protection policies and procedures.
- Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- The School has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least one member of the Governing Board has undertaken accredited safer recruitment training.
- All staff receive safeguarding and child protection training annually and receive regular updates from the Designated Safeguarding Lead to ensure they remain up to date with new legislation.(Best practice is that training is carried out every year) Free safeguarding training is available for all Croydon schools via the [Learning & Development section of the CSCB website](#).
- The School has procedures in place to deal with allegations made against other students.
- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from students.
- Governors will have their own separate code of conduct. This is a responsibility of the governing board or trust.

#### **Croydon's Children Families & Education Directorate**

The Directorate includes services that will support the School to safeguard and promote the welfare of students by:

- Co-ordinating the delivery of integrated children's services within the borough, including an early help service
- providing statutory social work services under the Children Act 1989

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- providing the School with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)

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## Appendix 2

### CHILD PROTECTION; DEFINITIONS AND INDICATORS

#### Definitions

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse. Under the Children Act 1989, CSSW have a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering **significant harm**, which is defined as:

**Neglect:** failure to provide basic care to meet the child's physical needs, such as not providing adequate food, clothing or shelter; failure to protect the child from harm or ensure access to medical care and treatment.

**Physical abuse:** causing physical harm or injury to a child.

**Sexual abuse:** involving children in sexual activity, or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.

**Emotional abuse:** failure to provide love and warmth that affects the child's emotional development; psychological ill treatment of a child through bullying, intimidation or threats.

#### Possible indicators of abuse and neglect

<b>Neglect</b>	<ul style="list-style-type: none"><li>• Inadequate or inappropriate clothing</li><li>• Appears underweight and unwell and seems constantly hungry</li><li>• Failure to thrive physically and appears tired and listless</li><li>• Dirty or unhygienic appearance</li><li>• Frequent unexplained absences from school</li><li>• Lack of parental supervision</li></ul>
<b>Physical abuse</b>	<ul style="list-style-type: none"><li>• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li><li>• Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li><li>• High frequency of injuries</li><li>• Parents seem unconcerned or fail to seek adequate medical treatment</li></ul>
<b>Sexual abuse</b>	<ul style="list-style-type: none"><li>• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development</li><li>• Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend</li><li>• Continual, inappropriate or excessive masturbation</li><li>• Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</li><li>• Unwillingness to undress for sports</li></ul>
<b>Emotional abuse</b>	<ul style="list-style-type: none"><li>• Developmental delay</li><li>• Attachment difficulties with parents and others</li><li>• Withdrawal and low self-esteem</li></ul>
<b>Indirect indicators of abuse and neglect</b> <b>Including Domestic Abuse</b>	<ul style="list-style-type: none"><li>• Sudden changes in behaviour</li><li>• Withdrawal and low self-esteem</li><li>• Eating disorders</li><li>• Aggressive behaviour towards others</li><li>• Sudden unexplained absences from school</li><li>• Drug/alcohol misuse</li><li>• Running away/going missing</li></ul>

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<b>Parental attributes</b>	<ul style="list-style-type: none"> <li>• Misusing drugs and/or alcohol</li> <li>• Physical/mental health or learning difficulties</li> <li>• Domestic violence</li> <li>• Avoiding contact with school and other professionals</li> </ul>
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### **Vulnerability Factors CSE/CCE**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

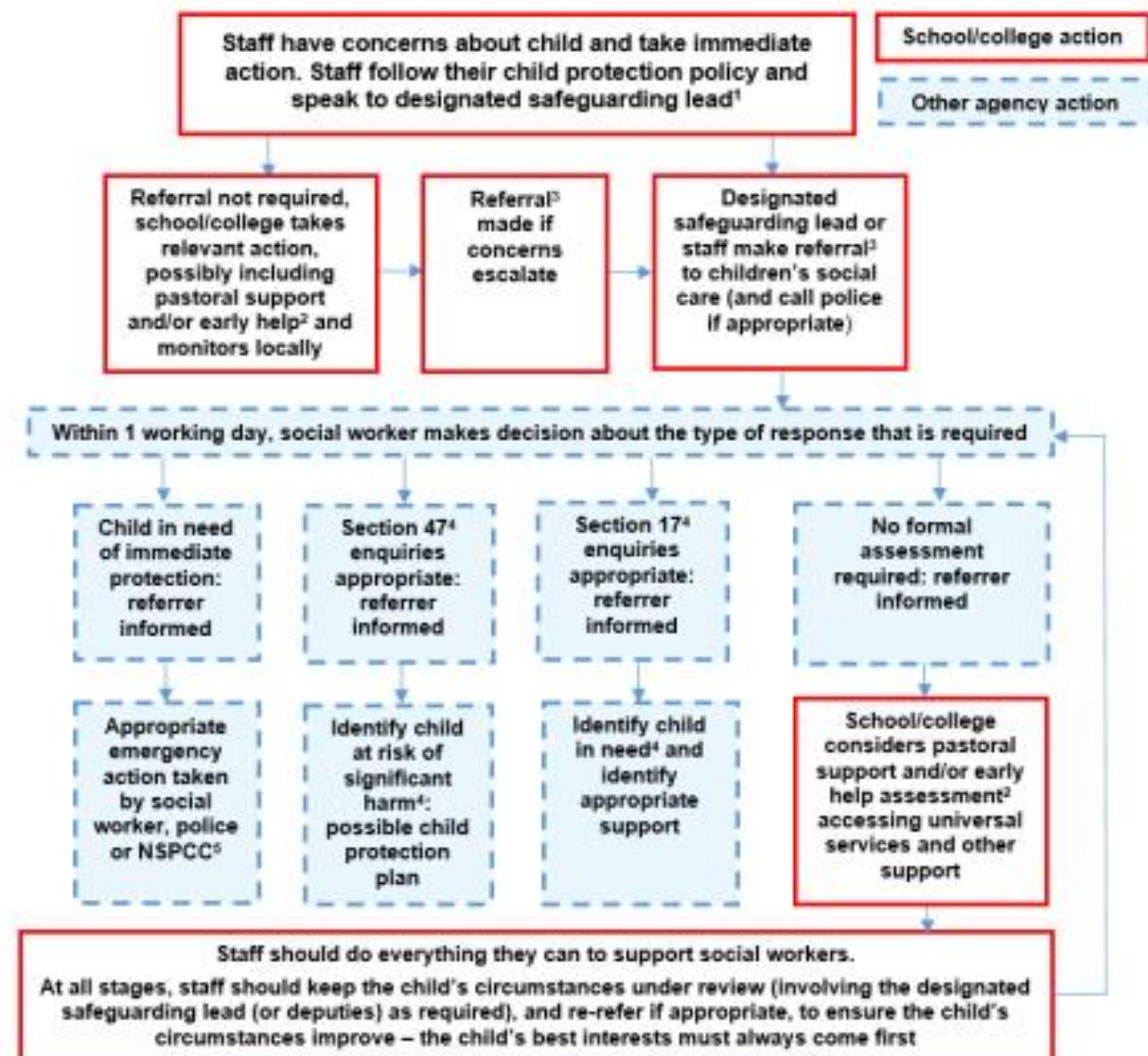
- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories);
- Sexual identity.



## Appendix 3

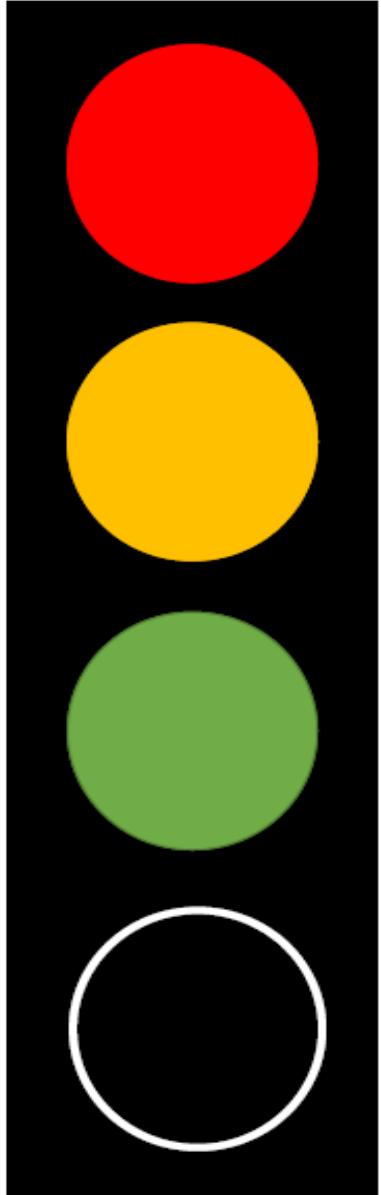
Keeping Children Safe in Education 2024 - Actions where there are concerns about a child

### Actions where there are concerns about a child



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## Lanyard Colour Guide

*All adults at Priory are expected to wear their designated lanyard to support effective Safeguarding.*

*Safeguarding is everyone's responsibility.*

RED LANYARD- Visitor
<ul style="list-style-type: none"><li>This person does <b>not</b> have a DBS e.g. a parent/carer.</li><li>This person cannot be left unaccompanied with students.</li></ul>

AMBER LANYARD- Short Term
<ul style="list-style-type: none"><li>This person is a daily/short-term agency member of staff at Priory.</li><li>This person has a DBS check.</li><li>This person can be left alone with students.</li><li>This person has access to a generic fob-key.</li></ul>

GREEN LANYARD- Long Term and DBS Visitors	
<ul style="list-style-type: none"><li>This person is a long-term agency member of staff at Priory (1 month + service).</li><li>This person has access to a fob-key, which they sign for.</li><li>This person has a DBS check.</li></ul>	<ul style="list-style-type: none"><li>This person has a DBS.</li><li>This person can be left unaccompanied with students.</li><li>This person should wear a <b>green visitor</b> lanyard and where appropriate, a fob-key.</li></ul>

BLACK LANYARD- Staff
<ul style="list-style-type: none"><li>This person is a contracted member of staff at Priory.</li><li>This person has a DBS check.</li><li>This person has a badge with a built in fob.</li></ul>



# Privacy Notice for Job Applicants

## Summer 2025 to Summer 2026

Priory School is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your work relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

Successful candidates should refer to our privacy notice for staff for information about how their personal data is stored and collected.

### **Who Collects This Information**

Priory School is a "data controller." This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### **Data Protection Principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

### **The Categories of Information That We Collect, Process, Hold and Share**

We may collect, store and use the following categories of personal information about you up to the shortlisting stage of the recruitment process: -

- Personal information and contact details such as name, title, addresses, date of birth, marital status, phone numbers and personal email addresses;
- Emergency contact information such as names, relationship, phone numbers and email addresses;
- Information collected during the recruitment process that we retain during your employment including proof of right to work in the UK, information entered on the application form, CV, qualifications;
- Details of your employment history including job titles, salary and working hours;
- Information regarding your criminal record as required by law to enable you to work with children;
- Details of your referees and references;
- Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs.

We may also collect information after the shortlisting and interview stage in order to make a final decision on where to recruit, including criminal record information, references,



# Privacy Notice for Job Applicants

## Summer 2025 to Summer 2026

information regarding qualifications. We may also ask about details of any conduct, grievance or performance issues, appraisals, time and attendance from references provided by you.

### **How We Collect This Information**

- We may collect this information from you, your referees, your education provider, relevant professional bodies the Home Office and from the DBS.

### **How We Use Your Information**

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Where we need to take steps to enter into a contract with you;
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.
- Where you have provided your consent for us to process your personal data.

Generally the purpose of us collecting your data is to enable us to facilitate safe recruitment and determine suitability for the role. We also collect data in order to carry out equal opportunities monitoring and to ensure appropriate access arrangements are put in place if required.

If you fail to provide certain information when requested, we may not be able to take the steps to enter into a contract with you (for example if incorrect references are provided), or we may be prevented from complying with our legal obligations (such as to determine suitability to work with children).

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **How We Use Particularly Sensitive Information**

Sensitive personal information (as defined under the UK GDPR as "special category data") require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances: -

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- Where it is needed in the public interest, such as for equal opportunities monitoring;
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.



# Privacy Notice for Job Applicants

## Summer 2025 to Summer 2026

### Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.

### Sharing Data

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

These include the following: -

- Academic or regulatory bodies to validate qualifications/experience (for example the teaching agency);
- Referees;
- Our Local Authority in order to meet our legal obligations for sharing data with it;
- Other schools;
- DBS; and
- Recruitment and supply agencies.

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually information will be anonymised but this may not always be possible. The recipients of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

### Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed. Full details on how long we keep personal data for is set out in our data retention policy.

### Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third



# Privacy Notice for Job Applicants

## Summer 2025 to Summer 2026

parties who have a business need to know. Details of these measures are available in the School's Data Protection Policy.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Your Rights of Access, Correction, Erasure and Restriction**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances by law you have the right to: -

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact Priory School in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to Withdraw Consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Linda Cunningham. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.



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### **How to Raise a Concern**

We hope that Priory School can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Linda Cunningham then you can contact the DPO on the details below: -

Data Protection Officer: Craig Stillwell  
Judicium Consulting Limited  
Address: 72 Cannon Street, London, EC4N 6AE  
Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)  
Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.