



PRIORY SCHOOL
EDGBASTON

SAFEGUARDING POLICY

(STATUTORY)

Trustee Committee:	Risk and Compliance	
Date Approved:	September 2027	
Next of Review:	September 2028	
Member of Staff Responsible:	Declan Griffin	
Trustee Overseer:	Risk and Compliance Committee	
Safeguarding Governor	Anne Cleary : A.Cleary@prioryschool.net	
Intended Audience:	Options: Employees, Volunteers, Parents, Pupils, and Visitors	
Relevance:	Whole School	Yes
	Early Years	Yes
	Preparatory	Yes
	Seniors	Yes
Access:	Website	Yes
	Internal	No
	Restricted	No

Safeguarding & Child Protection Policy for Schools,
Education Settings & Education Services

Our Mission Statement

Priory School is a thriving, co-educational independent school founded upon a rich Catholic heritage which welcomes those from all faiths and none.

In partnership with parents and guardians we provide a nurturing, family-based ethos, alongside high-standards of teaching and learning, enabling all pupils to achieve their potential.

We embrace diversity and interfaith understanding alongside awareness of environmental and global issues, in response to the needs of our time.

The Governors and staff at Priory School are committed to providing a fully accessible environment which values and includes all pupils, staff, parents and visitors, regardless of their education, physical, sensory, social, spiritual, emotional or cultural needs.

The Governors, staff, and pupils are committed to the safeguarding and welfare of pupils and staff.

To meet the needs of our school community, all our policies, including this policy, can be made available on different formats such as different font sizes or styles, colour, or alternate languages.

The Governing Council understands it has responsibility for ensuring the effective oversight of this policy and will assess, evaluate, and review as necessary.

Response to the Mission Statement

We view all Priory children as children of God and we encourage them to always give their best and treat others as they would like to be treated. We promise an ethos of showing our faith throughout our daily life. Our children deserve to learn and grow in a safe and happy environment which is free from harm and through our safeguarding policy and procedures, we aim to ensure we maintain the highest standards of care for each and every child.

Important Safeguarding Contacts

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Mr Declan Griffin – Deputy Head of Prep School	07870 908750
Deputy DSL	Mr Alex Flood – Assistant Headteacher	07842 034836
Deputy DSL	Mrs Serah Mockbil – Early Years Manager	07975 593678 / Ext. 209
Deputy DSL	Ms Fiona Guiver – Deputy Headteacher	07805143797
Deputy DSL	Ms Perdeep Uppal – Assistant Head of Prep School	07975 605527
Deputy DSL	Mrs Gilbert Silver – Poppets Deputy DSL	Ext.309
Chair of Governors	Mr Stuart Brereton	07775714165
Headteacher	Dr Leanne Flood	07790356585
Safeguarding Governor	Anne Cleary	A.Cleary@prioryschool.net
Designated Teacher – Looked After and Previously Looked After Children	Mr Declan Griffin (Prep) Mr Alex Flood (Seniors)	As above
Prevent/CONTEST Single Point of Contact (SPOC)	Mr Declan Griffin	As above

DSL-trained safeguarding staff

- Mrs Chloe Bowyer
- Ms Zaira Tanveer
- Mrs Kerry Messam
- Andrea Wilkes
- Rebecca Higgins

If the DSL is unavailable, staff should contact a Deputy DSL. The absence of the DSL or a Deputy DSL must never delay action where there is concern that a child may be at risk of harm.

External Safeguarding Contacts

Organisation	Contact details
Birmingham Children's Trust – Children's Advice and Support Service (CASS)	0121 303 1888
CASS – Emergency Out of Hours	0121 675 4806
Birmingham Local Authority Designated Officer (LADO)	0121 675 1669 • ladoteam@birminghamchildrenstrust.co.uk
Birmingham Early Help Support Team	0121 303 8117
Police – Emergency	999
Police – Non-emergency	101
NSPCC Helpline	0800 800 5000 • help@nspcc.org.uk
NSPCC Whistleblowing Advice Line	0800 028 0285

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Section 1 - Introduction

Safeguarding and promoting the welfare of children is everyone's responsibility. A child is anyone under the age of 18. All practitioners should take a child-centred approach and consider, at all times, what is in the best interests of the child.

In accordance with Keeping Children Safe in Education 2026 (KCSIE), safeguarding and promoting the welfare of children means: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Schools and their staff form part of the wider safeguarding system. No single practitioner can have a complete picture of a child's needs and circumstances. Everyone who comes into contact with children has a role in identifying concerns, sharing information and taking prompt action so that children and families receive the right help at the right time.

Staff working with children should maintain an attitude of "it could happen here" when safeguarding is concerned and should always act in the best interests of the child. Children may experience harm within or outside the home, within school, in the community or online. Safeguarding issues frequently overlap and should not necessarily be viewed in isolation.

All staff should understand that children may not feel ready or know how to tell somebody that they are being abused, exploited or neglected and may not recognise their experiences as harmful. Vulnerability, disability, sexual orientation, embarrassment, humiliation, threats or language barriers may create additional barriers to disclosure. This must not prevent staff from acting on concerns.

At Priory School this means:

Priory School is committed to safeguarding and promoting the welfare of every pupil. Safeguarding is the responsibility of all staff, governors, volunteers and adults working on behalf of the School. The welfare and best interests of the child will be central to decisions about their safety, support and wellbeing.

We seek to identify concerns and unmet needs at the earliest opportunity and provide, coordinate or secure appropriate support. Staff are expected to act promptly where concerns arise and not wait for a situation to escalate before taking action.

Staff must record and report safeguarding concerns promptly through CPOMS and speak directly to the Designated Safeguarding Lead (DSL) or a Deputy DSL where the concern is urgent, significant or requires immediate action. Staff must not assume that another colleague or professional will take action on their behalf.

Priory expects staff to exercise professional curiosity. Concerns may arise from a disclosure, observation, changes in behaviour, attendance, relationships, online activity, information from another person or a pattern of apparently minor incidents. Staff should report concerns even where they are uncertain about their significance.

Staff will seek to build trusted relationships with pupils and create an environment in which children feel able to speak. A lack of disclosure will never, by itself, be taken as evidence that safeguarding concerns do not exist. The child's communication needs and individual circumstances will be considered when seeking and recording their views.

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All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences can affect a child's welfare, wellbeing, mental health and willingness to seek help and should be considered within safeguarding practice where appropriate.

Some children may face an increased risk of harm or additional barriers to recognising or disclosing abuse, neglect or exploitation. Staff should be alert to children who may require additional support because of their individual needs, experiences or circumstances.

All staff should be prepared to identify children who may benefit from Family Help. Any child may benefit from support before statutory intervention, including universal services, community-based Early Help or the targeted early-help level of Family Help.

All staff have a responsibility to provide a safe environment in which children can learn. KCSIE requires staff to understand the safeguarding systems operating within their school and to receive appropriate safeguarding and child-protection training.

KCSIE requires governing bodies and proprietors to ensure that staff who work directly with children read at least Part One, and from 2026 those staff who do not work directly with children should also read Part One. Mechanisms should be in place to help staff understand and discharge those responsibilities.

Racist, faith-targeted, discriminatory and other prejudice-based incidents will not automatically be treated solely as behaviour matters. Staff will consider whether there are wider safeguarding implications for the child or children involved and record and escalate concerns accordingly.

Priory will give particular consideration to children who may be more vulnerable, including those with SEND or health conditions; children with mental health needs; young carers; looked-after and previously looked-after children; children experiencing difficulties with attendance; children affected by domestic abuse, parental offending or substance misuse; and those at risk of exploitation, trafficking, serious violence, radicalisation, FGM, forced marriage or other forms of abuse. More detailed expectations are set out later in this policy.

Priory will seek to respond to emerging needs early. Where appropriate, the DSL team will coordinate support with the child, parents/carers and other professionals in accordance with Birmingham safeguarding arrangements and Right Help, Right Time. Where a child's circumstances meet the threshold for statutory assessment or protection, an appropriate referral will be made without delay.

Safeguarding arrangements are embedded throughout the School, including the EYFS, Preparatory and Senior School. Staff receive safeguarding induction, appropriate training and regular updates and are made aware of the identity and role of the DSL and Deputy DSLs, reporting arrangements, relevant policies and the School's safeguarding procedures.

All Priory School staff will read Part One of Keeping Children Safe in Education 2026. The School will provide training and appropriate mechanisms to check that staff understand their safeguarding duties rather than relying solely on confirmation that the document has been read.

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Safeguarding arrangements should extend to circumstances in which children receive education or take part in activities away from the main school site.	This policy applies to the whole School, including EYFS, Preparatory and Senior provision, and to school-organised activities, educational visits, fixtures, residential visits, remote provision and alternative or externally commissioned education. Where safeguarding concerns arise in relation to external providers using the School premises, Priory will follow its safeguarding procedures and make any appropriate referral to the relevant safeguarding agency.
Schools will fulfil their local and national responsibilities as laid out in the following documents: This policy should be read alongside current statutory guidance, legislation and local safeguarding arrangements. In particular, Priory School will have regard to: • Keeping Children Safe in Education 2026 • Working Together to Safeguard Children • the Children Act 1989 and Children Act 2004 • relevant provisions of the Education Act 2002 • Data (Use and Access) Act 2025 • Children’s Wellbeing and Schools Act 2026 • Crime and Policing Act 2026 • The statutory Early Years Foundation Stage Framework • the Prevent Duty Guidance • current statutory guidance relating to Female Genital Mutilation • current guidance on information sharing • current guidance on sharing nudes and semi-nudes • current Department for Education Filtering and Monitoring Standards • West Midlands Safeguarding Children Procedures • Birmingham Safeguarding Children Partnership procedures and threshold guidance, including <i>Right Help, Right Time</i> • relevant data-protection legislation and guidance.	Specific safeguarding issues Priory School recognises the specific safeguarding issues identified in Annex A of <i>Keeping Children Safe in Education 2026</i>. These are: • child abduction and community safety incidents; • child criminal exploitation (CCE) and child sexual exploitation (CSE); • children and the court system; • children who are absent from education; • children with family members in prison; • cybercrime; • domestic abuse; • homelessness; • modern slavery and the National Referral Mechanism; • preventing radicalisation; • serious violence; and • honour or faith-based abuse, including female genital mutilation and forced marriage. Further information and appropriate safeguarding responses relating to these issues are addressed throughout this policy. Staff should recognise that safeguarding concerns frequently overlap and should consider the child’s circumstances as a whole rather than treating individual concerns in isolation.

Section 2 – Overall Aims

Safeguarding should be embedded within a whole-school, child-centred culture in which children feel safe, are listened to and are able to raise concerns. The welfare and best interests of the child should remain central to decision-making.

Schools should seek to identify concerns early and ensure children receive the right help at the right time, including support before statutory intervention where appropriate.

Safeguarding arrangements should support staff to recognise abuse, neglect, exploitation and other indicators of harm, including where concerns are subtle, developing or overlapping.

Schools should take a preventative approach to safeguarding. Children should be taught, in an age-appropriate way, how to recognise risk, develop healthy relationships, keep themselves safe and seek help.

Online safety should be an interrelated and recurring theme across safeguarding, curriculum, staff training, parental engagement and the school's technical arrangements. KCSIE recognises that technology is a significant component in many safeguarding and wellbeing concerns.

Safeguarding practice should recognise that children can be harmed through discrimination and prejudice and that some children may experience additional vulnerabilities or barriers to seeking help.

At Priory School this means:

We will create and maintain an environment in which pupils feel safe, valued and respected and know which adults they can approach if they are worried about themselves or somebody else. Pupils' wishes, feelings and lived experiences will be considered when safeguarding decisions are made.

We will identify emerging needs and safeguarding vulnerabilities as early as possible, record concerns promptly and provide, coordinate or seek appropriate support. Where necessary, this will include pastoral intervention, community-based Early Help, Family Help or referral to statutory services.

Staff will receive appropriate training and updates to help them recognise signs and indicators of harm, understand the vulnerabilities children may face and exercise professional curiosity where something does not appear right.

Through PSHEE, Relationships and Health Education, Computing, assemblies, form time, the wider curriculum and pastoral provision, pupils will be taught how to recognise unsafe situations, healthy and unhealthy relationships, consent and boundaries, online risks, exploitation, bullying, discrimination and how to seek support.

We will promote safe and responsible use of technology and maintain appropriate filtering and monitoring arrangements. Pupils and staff will be supported to understand risks arising from social media, gaming, online grooming, image-based abuse, misinformation and disinformation, generative AI and emerging technologies.

We will challenge racism, faith-based prejudice, sexism, misogyny/misandry, homophobia, biphobia, transphobic bullying and other discriminatory behaviour. Such incidents will be considered through both behaviour and safeguarding processes where appropriate.

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Children can experience abuse or harm from other children. Schools should maintain a culture in which inappropriate and abusive behaviour is challenged and never normalised as “banter”, “part of growing up” or similar.

Effective safeguarding depends upon communication and partnership between children, families, staff and external agencies.

Safeguarding information must be appropriately recorded, shared and reviewed. Poor recording, failure to reassess concerns and failure to share information can place children at risk.

Schools should continually review the effectiveness of their safeguarding arrangements and respond to weaknesses, emerging risks and learning from incidents.

We will maintain clear expectations around respectful behaviour and relationships and will respond appropriately to child-on-child abuse, bullying, harmful sexual behaviour, sexual harassment and violence, online abuse and other harmful peer behaviour.

We will work openly and collaboratively with parents and carers wherever it is safe and appropriate to do so and will work with Birmingham Children’s Trust, health, police, Early Help, the local authority and other relevant agencies to safeguard children.

Safeguarding concerns, decisions, actions and outcomes will be recorded appropriately on CPOMS. The DSL team will review safeguarding information, identify developing patterns and ensure that concerns are followed up and escalated where necessary.

Safeguarding practice will be reviewed throughout the year. Any identified deficiencies, gaps or weaknesses will be addressed without delay, and learning from safeguarding incidents, audits, complaints, external advice and local or national reviews will inform improvements to policy and practice.

The overall aim of Priory School’s safeguarding arrangements is not simply to respond when harm has occurred, but to create a culture in which risk is recognised early, children are confident to speak, staff act promptly and appropriately, and safeguarding is embedded throughout the life of the School.

Section 3 – Guiding Principles

Safeguarding practice should be child-centred and informed by the child's wishes, feelings and lived experience.

Children and families should receive the right help at the right time, with concerns addressed as early as possible.

Effective safeguarding depends on open, collaborative working with children, families and professionals.

Practice should build on family strengths while remaining professionally curious and focused on the child's welfare.

At Priory School this means:

We listen to children, record their voice and consider their lived experience when making safeguarding decisions.

We act early, provide appropriate support and escalate concerns where a child's needs or level of risk increase.

We work with parents/carers and relevant agencies wherever it is safe and appropriate to do so, sharing information when necessary to protect children.

We work constructively with families, but will challenge, reassess or refer where concerns remain or a child's situation is not improving.

Priory School will follow Birmingham Safeguarding Children Partnership procedures and the principles of *Right Help, Right Time* when assessing need and determining the appropriate level of support or intervention.

Section 4 - Expectations of Staff and Other Adults

All staff must understand the safeguarding systems within the School and their individual responsibility to act on concerns.

All staff should read Part One of KCSIE 2026. School leaders and staff working directly with children should also read the relevant Annex containing additional safeguarding information.

If staff have a concern about a child, they must act immediately. The unavailability of the DSL or Deputy DSL must not delay appropriate action.

When a child discloses abuse, staff should listen, take the child seriously, avoid leading questions, never promise confidentiality and report the information promptly.

Staff must raise concerns about the conduct of adults working with children, including low-level concerns, allegations and unsafe safeguarding practice.

Temporary staff, supply staff, volunteers, contractors and visitors must understand the safeguarding expectations relevant to their role.

At Priory School this means:

Staff will know the identity of the DSL and Deputy DSLs, how to report concerns, how to access this policy, the Staff Code of Conduct, Behaviour Policy and Whistleblowing Policy.

Staff will complete required reading and safeguarding training at induction and receive updates at least annually and whenever significant changes arise.

Concerns will be recorded promptly on CPOMS and reported to the DSL team. Urgent concerns must also be communicated directly to a DSL or senior leader. Where a child is in immediate danger, emergency services or Children's Social Care will be contacted without delay.

Staff will listen, reassure, record and report. They will not investigate the concern themselves. The child's own words will be recorded wherever possible.

Concerns about adults will be reported through the procedures set out later in this policy and the Staff Code of Conduct. Staff may use the School's whistleblowing procedures where necessary.

Appropriate safeguarding information will be provided on arrival or induction, including how to identify the DSL team and how to report a concern.

If a member of staff is unsure whether something constitutes a safeguarding concern, they should speak to the DSL or a Deputy DSL. Uncertainty must never be a reason for inaction.

Section 5 – Safeguarding Leadership and Responsibilities.

The Designated Safeguarding Lead (DSL) must be a senior member of the leadership team and takes lead responsibility for safeguarding and child protection, including online safety and oversight of filtering and monitoring. The DSL must have sufficient authority, time, training, resources and support to carry out the role effectively.

The DSL leads safeguarding referrals, works with external agencies, advises staff, oversees safeguarding records and ensures children receive appropriate support.

Deputy DSLs may undertake safeguarding duties, but lead responsibility remains with the DSL.

The Headteacher is responsible for ensuring safeguarding policies and procedures are implemented effectively and understood by staff.

The Designated Teacher for looked-after and previously looked-after children promotes their educational achievement and works with the Virtual School Head and other professionals.

The Governing Body has strategic responsibility for safeguarding and must assure itself that policies, procedures and training are effective and compliant.

Safeguarding arrangements must be regularly reviewed and weaknesses addressed promptly.

At Priory School this means:

Priory will maintain a clearly identified DSL and appropriately trained Deputy DSLs. A DSL or Deputy DSL will be available during the school day to discuss safeguarding concerns. Appropriate cover arrangements will operate whenever the DSL is unavailable.

The DSL team will monitor CPOMS, coordinate safeguarding action, liaise with Birmingham Children's Trust and other agencies, oversee referrals and ensure decisions, actions and outcomes are recorded.

Deputy DSLs will support and deputise for the DSL across the School and have appropriate access to safeguarding information and systems.

The Headteacher will promote a strong safeguarding culture, ensure appropriate resources and training are available and address identified weaknesses or deficiencies without delay.

Priory will identify appropriately trained staff to lead this work and ensure that safeguarding, attendance and educational needs of looked-after and previously looked-after pupils are considered together.

Governors will receive appropriate safeguarding training. The Safeguarding Governor will provide challenge and assurance, work with the DSL and Headteacher and report safeguarding matters to the Governing Body. Their role remains strategic rather than operational.

Safeguarding will be reviewed through governance oversight, audits, safeguarding reports, filtering and monitoring reviews and learning from incidents or concerns.

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At Priory School this means:

The School will maintain a clearly identified Designated Safeguarding Lead (DSL), supported by appropriately trained Deputy Designated Safeguarding Leads (DDSLs) and other DSL-trained safeguarding staff.

Role	Name	Position
Designated Safeguarding Lead (DSL)	Mr Declan Griffin	Deputy Head of Prep School
Deputy DSL	Mr Alex Flood	Assistant Head of Senior School
Deputy DSL	Mrs Serah Mockbil	Early Years Manager
Deputy DSL	Ms Fiona Guiver	Deputy Head of Senior School
Deputy DSL	Ms Perdeep Uppal	Assistant Head of Prep School
Deputy DSL	Miss Emmie O'Rourke	Poppets Deputy Manager

DSL-trained safeguarding staff

- Ms J Williams
- Ms Zaira Tanveer
- Mrs Kerry Messam
- Mrs Andrea Wilkes
- Mrs Rebecca Higgins

Dr Leanne Flood, Headteacher, is undertaking DSL training and will be added to the safeguarding team following completion of the required training and formal designation.

Section 6 – Safer Recruitment and Ongoing Suitability

Recruitment and selection must comply with Part Three of KCSIE 2026, the requirements applying to independent schools and, where relevant, the EYFS statutory framework.

Recruitment should include appropriate scrutiny of applications, employment history, references and suitability to work with children. Schools should consider online searches of shortlisted candidates as part of their due diligence.

Required pre-appointment checks must be completed according to the role and circumstances of the individual.

Schools must maintain an accurate Single Central Record (SCR) of the checks required by KCSIE and the Independent School Standards.

Appropriate arrangements must also apply to agency and third-party staff, trainee teachers, volunteers, contractors and governors.

KCSIE 2026 reflects changes to regulated activity involving volunteers, including changes introduced by the Crime and Policing Act 2026.

Safer recruitment does not end at appointment. Schools should maintain a culture of vigilance regarding the continuing suitability of adults working with children.

Priory operates safer recruitment procedures for staff, supply staff, volunteers, governors, contractors, coaches, peripatetic staff and others working with children. At least one appropriately safer-recruitment-trained person will be involved in recruitment processes.

We require a completed application form rather than accepting a CV alone. Employment gaps and inconsistencies will be explored, appropriate references and self-declarations obtained, and online searches considered for shortlisted candidates.

Checks will include, as applicable: identity, right to work, enhanced DBS, Children's Barred List, prohibition from teaching, Section 128 prohibition from management, qualifications, overseas checks and childcare disqualification requirements.

Required checks and dates will be recorded accurately on Priory's SCR. The SCR will be routinely reviewed and any omissions or discrepancies addressed promptly.

Priory will obtain the required written assurances from agencies and third parties, verify individuals' identity on arrival and ensure volunteers, contractors and governors receive the checks or supervision appropriate to their role. No unchecked person will undertake regulated activity.

Priory will determine volunteer checking requirements in accordance with the current definition of regulated activity and will not rely on outdated supervision exemptions when deciding whether a barred-list check is required.

Induction, probation, supervision, appraisal, safeguarding training, the Staff Code of Conduct and procedures for allegations and low-level concerns will support ongoing suitability throughout employment or engagement.

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Where the statutory criteria are met, schools must make appropriate referrals to the Disclosure and Barring Service (DBS) and, where applicable, the Teaching Regulation Agency (TRA).

Priory will make statutory referrals promptly when the relevant criteria are met, including where a person leaves before a safeguarding process is concluded.

Detailed recruitment, vetting and SCR procedures will be operated in accordance with Part Three of KCSIE 2026 and the School's safer recruitment procedures.

Section 7 – Safeguarding Training, Induction and Staff Support

All staff must receive safeguarding and child protection training, including online safety and their responsibilities for filtering and monitoring, at induction. Training must be regularly updated, with safeguarding updates provided at least annually.

All staff should read Part One of KCSIE 2026 and understand the School's safeguarding systems and procedures.

Staff must know how to recognise concerns, respond to disclosures, share information appropriately and take prompt safeguarding action.

DSLs and Deputy DSLs require appropriate specialist training and should refresh their knowledge and skills regularly.

Governors must receive appropriate safeguarding and child protection training, including online safety, to enable them to provide effective challenge and assurance.

Schools should recognise the impact that safeguarding work can have on staff and provide appropriate support.

At Priory School this means:

All staff receive safeguarding induction and annual safeguarding training, including the relevant KCSIE updates. Additional briefings and updates will be provided throughout the year when required.

Induction will cover this policy, the Behaviour Policy, Staff Code of Conduct, Whistleblowing Policy, children absent from education procedures, online safety, CPOMS reporting and the identity and role of the DSL team.

New staff will be shown how to record concerns on CPOMS and will understand that urgent safeguarding concerns must also be raised directly with a DSL or Deputy DSL.

The DSL and Deputy DSLs will complete appropriate DSL training at least every two years and maintain their knowledge through regular updates, local safeguarding networks and relevant professional development.

Governors will receive safeguarding training at induction and appropriate updates thereafter. Training records will be maintained centrally.

The DSL's will be offered regular safeguarding supervision, monthly. Support and supervision will also be available to other staff involved in complex or distressing safeguarding matters where appropriate.

Temporary staff, volunteers, contractors and other adults working within the School will receive safeguarding information and induction proportionate to their role, including how to report a concern and how to contact the DSL team.

Section 8 – Restrictive Interventions, including Reasonable Force

There are limited circumstances in which staff may use a restrictive intervention, including reasonable force, to safeguard pupils or others. Reasonable force means using no more force than is necessary for the least amount of time. ([GOV.UK](https://www.gov.uk))

School staff have a legal power to use reasonable force in certain circumstances, including to prevent or stop a pupil injuring themselves or others, committing a criminal offence, damaging property or causing disorder. ([GOV.UK](https://www.gov.uk))

Force must never be used as a punishment. Restraint that compromises a pupil's airway, breathing or circulation must not be used. Restrictive intervention carries a risk of both physical and psychological harm and should be avoided where possible. ([GOV.UK](https://www.gov.uk))

Schools should not operate a "no contact" policy, as this may prevent staff from appropriately supporting or protecting pupils. ([GOV.UK](https://www.gov.uk))

Schools should seek to minimise the need for restrictive interventions through prevention and de-escalation and should understand individual pupils' needs, triggers and communication.

Particular consideration should be given to pupils with SEND, who may be disproportionately affected by restrictive interventions. Schools should consider communication needs, sensory factors, distress, health needs and reasonable adjustments. Where an increased likelihood of restrictive intervention is identified, an appropriate risk assessment must be in place. ([GOV.UK](https://www.gov.uk))

Behaviour or support plans may identify circumstances where increased physical contact or intervention could be necessary, but this does not remove the need to

At Priory School this means::

Priory prioritises positive relationships, clear routines, preventative support and de-escalation. Restrictive intervention will be used only where necessary and proportionate to the circumstances.

Staff will use their professional judgement when immediate intervention is necessary to protect a pupil or another person. Any force used must be the minimum reasonably required to achieve the legitimate purpose.

Corporal punishment and the use or threat of force as a punishment are prohibited. Staff will act in accordance with their training and immediately cease or modify an intervention where there is concern about a pupil's physical safety. Medical attention will be sought where appropriate.

Priory does not operate a no-contact policy. Appropriate physical contact may be necessary for care, first aid, guidance, instruction, reassurance or safeguarding as well as in the lawful use of reasonable force.

Staff will use preventative and de-escalation strategies wherever possible. Where patterns or foreseeable risks emerge, individual support plans and risk assessments will be developed and shared with relevant staff.

Decisions will take account of the pupil's age, development, SEND, communication needs, medical needs, mental health, trauma, sensory needs and other vulnerabilities. Where appropriate, plans will be developed with the pupil, parents/carers, SEND staff and relevant professionals.

Individual plans may identify agreed positive-handling or de-escalation approaches. These will support staff decision-making but will never authorise automatic restraint or replace

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assess whether an intervention is reasonable in the circumstances at the time. ([GOV.UK](#))

From April 2026, schools must have procedures for recording every significant incident involving the use of force. Records should be completed as soon as practicable, normally on the same day. ([GOV.UK](#))

Schools must also record incidents of seclusion and restraint, including restraint which does not involve direct physical force. These recording requirements apply even where such interventions have previously been included within an agreed pupil support plan. ([GOV.UK](#))

Parents must be informed of significant uses of force, and of seclusion or restraint incidents, as soon as practicable, with schools expected to endeavour to do so on the same day. There are limited safeguarding exceptions where informing a parent would be likely to cause serious harm to the pupil. ([GOV.UK](#))

Incidents should be reviewed afterwards to understand what happened, support pupil and staff wellbeing, identify patterns and reduce the likelihood of recurrence. ([GOV.UK](#))

Governing bodies/proprietors should review data relating to restrictive interventions to identify patterns, training needs, ineffective support and any disproportionate use affecting pupils with SEND, protected characteristics or other vulnerabilities. ([GOV.UK](#))

professional judgement at the time of an incident.

Significant incidents involving reasonable force will be recorded promptly on CPOMS. Records will include what occurred, why intervention was necessary, relevant triggers and de-escalation attempted, the nature and duration of the intervention, any injuries and subsequent actions.

Any incident of seclusion or restraint falling within the statutory definition will be recorded in accordance with the School's restrictive-intervention procedures and brought to the attention of appropriate senior and safeguarding leaders.

Parents/carers will normally be informed in writing on the same day following a reportable incident. Where informing a parent may place the child at risk of serious harm, the DSL will determine the appropriate safeguarding response and any alternative reporting required.

Following an incident, the pupil and staff involved will be offered appropriate support and an opportunity to reflect. Existing risk assessments or support plans will be reviewed where necessary. The child's voice will be considered as part of that process.

Senior leaders will review restrictive-intervention records for patterns and learning. Appropriate safeguarding and governance oversight will be maintained, and practice, training or individual support will be amended where concerns or trends are identified.

Restrictive intervention is a safeguarding measure, not a behaviour sanction. Every decision to use reasonable force must be necessary, proportionate, lawful and focused on keeping pupils and others safe.

Section 9 – Prevention and Safeguarding Education

Effective safeguarding includes prevention as well as response. Schools should create a culture in which children feel safe, respected, listened to and confident to seek help.

Preventative education should be age-appropriate, inclusive and responsive to pupils' needs and vulnerabilities. It should help children recognise unsafe situations, abusive behaviour and healthy and unhealthy relationships.

Schools should promote a culture of zero tolerance for harmful behaviours including racism, sexism, misogyny/misandry, homophobia, biphobia, discriminatory behaviour, sexual harassment, sexual violence and other forms of abuse or intimidation.

Children should understand how to recognise and respond to risk both within and outside school, including risks arising in the community and through relationships with peers and adults.

Online safety forms an integral part of safeguarding education. Children need to understand how technology may expose them to harmful content, contact or behaviour.

Children should understand how and where to report concerns, and reporting systems should be accessible and appropriate to their age and needs.

Safeguarding education should respond to the actual risks affecting the school community rather than being limited to a fixed curriculum.

Priory will promote a whole-school safeguarding culture based on respectful relationships, clear expectations and trusted adults. Pupils will know who they can speak to if they are worried about themselves or somebody else.

Safeguarding education will be delivered through PSHEE/RSE, Computing, assemblies, form time, pastoral provision and the wider curriculum, with appropriate adaptation for age, SEND, communication needs and individual vulnerability.

Pupils will be taught about respect, equality, healthy relationships, consent, personal boundaries, stereotypes, prejudice and discrimination. Harmful behaviour will be challenged and will not be normalised as banter or part of growing up.

Pupils will be taught age-appropriate strategies for personal and community safety, recognising grooming, coercion and exploitation, resisting peer pressure, making safe choices and seeking help from trusted adults or appropriate services.

Pupils will receive age-appropriate education about online relationships, privacy, digital footprints, social media, gaming, image sharing, grooming, misinformation, harmful online influences and emerging technologies including AI. Detailed online safety arrangements are set out later in this policy.

Pupils are regularly reminded through assemblies, form time and pastoral provision that they can speak to their form teacher, pastoral staff, a DSL or any trusted adult. Reporting routes will be explained in an age-appropriate way throughout the year.

The DSL, pastoral and curriculum teams will use safeguarding information, pupil voice, local safeguarding intelligence and emerging patterns to identify where additional teaching, assemblies, targeted interventions or parental guidance are required.

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The School recognises that safeguarding extends beyond the school day and beyond the school site. A key part of preventative safeguarding is equipping pupils with the knowledge, skills, confidence and resilience to recognise risk, make safe decisions and seek help in both online and offline environments.

Section 10 – Family Help, Early Help and Statutory Intervention

Children should receive the right help at the right time. Support may be provided through universal services, community-based Early Help, targeted early help through Family Help, or statutory services where thresholds are met.

All staff should be alert to children who may benefit from support before statutory intervention and should act when concerns or unmet needs emerge.

Where needs require coordinated support beyond the School, a Family Help assessment or other multi-agency assessment may be appropriate.

Family Help and other support should be reviewed and should not continue indefinitely where a child's circumstances are failing to improve or are worsening.

A child may require statutory support under section 17 of the Children Act 1989 where they are a child in need. Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, a section 47 response may be required. KCSIE also identifies duties under sections 20 and 31.

Where a child is suffering or is likely to suffer harm, referral to local authority children's social care, and where appropriate the police, must be made immediately.

Although the DSL will normally coordinate referrals, any member of staff may make a referral where necessary. The absence or unavailability of a DSL must not delay action.

Effective safeguarding requires multi-agency cooperation and appropriate professional challenge where a child is not receiving the support or protection required.

This means that in our school:

Priory will use Birmingham Safeguarding Children Partnership's Right Help, Right Time framework to assess need and determine the appropriate level of support or intervention.

Concerns will be recorded on CPOMS and considered by the DSL team. Where needs can be met within school, appropriate pastoral, attendance, SEND or other school-based support may be put in place.

The DSL team will normally lead liaison with the child, family and relevant agencies. Priory may use Birmingham's Early Help Assessment, Our Family Plan and Signs of Safety/Wellbeing tools where appropriate.

Plans will have clear actions and review points. The DSL will monitor progress and escalate the response where support is ineffective, risks increase or further concerns emerge.

Where statutory thresholds may be met, the DSL will make a referral to Birmingham Children's Trust through CASS and will support subsequent assessment and multi-agency planning.

Safeguarding action will never be delayed in order to complete a Family Help process first. Where there is immediate danger, the Police will be contacted on 999 and CASS informed as appropriate.

Staff who believe immediate action is necessary may contact CASS or the Police directly. They must inform the DSL or a Deputy DSL as soon as practicable afterwards.

Priory will contribute to Family Help, Child in Need and Child Protection planning and relevant multi-agency meetings. Where the School remains concerned about an agency response, the DSL will use Birmingham's appropriate resolution and escalation procedures.

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The child's wishes, feelings and lived experience will inform assessment and planning. Parents and carers will be involved wherever it is safe and appropriate to do so. Where involving a parent may increase risk to the child or compromise safeguarding action, the DSL will seek advice and act in the child's best interests.

All concerns, assessments, decisions, referrals, plans, reviews and outcomes will be recorded appropriately on CPOMS.

Section 11 – Responding to Concerns About a Child

Any concern about a child's welfare must be acted on immediately. Staff should not assume another person will take action.

Concerns may arise from a disclosure, observation, change in behaviour or presentation, information from another person, attendance, online activity or a developing pattern of concerns.

When a child makes a disclosure, staff should listen carefully, remain non-judgemental, reassure the child that they have done the right thing by telling someone and explain what will happen next. A child must never be promised confidentiality.

Children may face barriers to disclosure and may not recognise their experiences as abusive, harmful or exploitative.

Victims must be taken seriously, supported and kept safe. They should never be made to feel ashamed or that they are creating a problem by reporting abuse.

Safeguarding records should be clear, factual and comprehensive and include concerns, discussions, decisions, reasons for decisions and outcomes.

This means that in our school we will:

All safeguarding concerns will be reported promptly. Staff will record the concern on CPOMS and speak directly to the DSL or a Deputy DSL where the concern is urgent, serious or requires immediate action. Recording on CPOMS does not replace speaking to a DSL when immediate action may be required.

Staff will exercise professional curiosity and report concerns even where they do not have the full picture or are uncertain about their significance. Concerns will be considered alongside existing safeguarding information rather than in isolation.

Staff will listen, reassure, record and report. They will not investigate, ask leading questions or seek to establish proof. Open questions may be used only where necessary to clarify what the child is communicating. Staff will explain that information must be shared with those who need to help keep the child safe.

Staff will take account of the child's age, development, SEND, communication needs, language, vulnerability and individual circumstances. A child who does not provide a full disclosure will still be safeguarded where concerns exist.

The child's immediate safety and wellbeing will be considered first. Appropriate support, trusted adults, safety arrangements and further action will be identified according to the circumstances.

Concerns will be recorded on CPOMS as soon as possible and on the same day. Entries will record the date and time, what was seen or heard, the child's own words where possible, action taken and the identity of the person making the record. Fact, professional opinion and information reported by others will be clearly distinguished.

The DSL will normally coordinate referrals to Birmingham Children's Trust through CASS. Where

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If a child is suffering or is likely to suffer harm, a referral to local authority children's social care and, where appropriate, the Police must be made immediately.	a child is in immediate danger, 999 will be called. Safeguarding action will not be delayed to complete internal processes, obtain parental consent or gather further evidence.
Any member of staff can make a referral. If the DSL or Deputy DSL is unavailable, this must not delay appropriate safeguarding action.	A member of staff may contact CASS or the Police directly where necessary, including where a DSL is unavailable or where they believe appropriate action has not been taken. The DSL must be informed as soon as practicable afterwards.
Following a referral, children's social care should acknowledge the referral and determine the required response. The referrer should follow up if this information is not received and should escalate where concerns remain.	The DSL or referrer will confirm the outcome of referrals, record it on CPOMS and continue to monitor the child. If the child's situation does not improve, or the School considers the response inadequate or delayed, the DSL will use Birmingham's professional challenge and escalation procedures.
Schools should support local authority assessments and subsequent multi-agency safeguarding work.	Priory will cooperate with assessments, strategy discussions, Child in Need processes, Child Protection Conferences, Core Groups and other relevant multi-agency meetings. The DSL will retain oversight of the child's welfare within School even where another agency is leading the intervention.

If a child tells you something that may be a safeguarding concern:

Listen: Give the child your full attention and allow them to speak.

Reassure: Tell them they have done the right thing by telling you.

Do not investigate: Do not ask leading questions, seek proof or confront another person.

Do not promise confidentiality: Explain that you need to share the information with people who can help.

Record: Make a factual CPOMS entry as soon as possible, using the child's own words wherever possible.

Report: Speak directly to the DSL or a Deputy DSL. If there is immediate danger, take emergency action.

Section 12 – Working with Parents, Carers and Families

Effective safeguarding normally involves working openly and collaboratively with parents, carers and wider family networks.

Parents should be involved in safeguarding and support planning where it is safe and appropriate to do so.

Parents or carers should not be informed where doing so may increase risk to the child or another person, compromise evidence or interfere with a statutory safeguarding or police response.

Safeguarding practice should consider the child's family circumstances, identity, culture, faith and lived experience while remaining professionally curious about the possibility that an adult may not be acting in the child's best interests.

Parents should normally be involved in Family Help and other supportive interventions, unless doing so would increase safeguarding risk.

Parental disagreement, refusal to engage or minimisation of concerns must not prevent appropriate safeguarding action.

This means that in our school:

Priory will seek to work constructively with parents and carers to understand concerns, strengthen support and promote the child's welfare.

Safeguarding discussions with parents will normally be led or agreed by the DSL or a Deputy DSL. Staff should not independently discuss significant safeguarding concerns with parents without first consulting the DSL team.

Where there is concern that informing a parent may place a child at increased risk, the DSL will seek advice from CASS, Children's Social Care or the Police as appropriate before making contact. Safeguarding action will not be delayed in order to obtain parental consent. Parents will not be informed where doing so may place the child or another person at increased risk, compromise evidence or prejudice a statutory safeguarding response.

Priory will seek to understand the wider family context and any barriers to support, while keeping the child's safety and welfare as the overriding consideration.

Parents and carers will be encouraged to contribute to Family Help, Child in Need and other support plans, attend relevant meetings and work with agreed actions designed to improve the child's safety and wellbeing.

Where parents decline support, dispute concerns or fail to engage with agreed safeguarding actions, this will be recorded and the DSL will consider whether the level of risk requires further support, professional challenge or referral to statutory services.

Safeguarding discussions with parents or carers will be recorded promptly on CPOMS, including who was involved, the key

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information shared, the parent/carer's response, decisions made and agreed next steps.

This Safeguarding and Child Protection Policy will be available to parents and carers through the School website.

Section 13 – Child-on-Child Abuse, including Harassment and Violence

Children can abuse other children. Child-on-child abuse can occur inside or outside school and online, and may occur even where there are no reported incidents.

Child-on-child abuse may include bullying and cyberbullying; prejudice-based and discriminatory abuse; abuse within intimate relationships; physical abuse; serious assault or threats involving weapons; sexual harassment; sexual violence; causing another child to engage in sexual activity without consent; nudes and semi-nudes; upskirting; and initiation/hazing behaviour.

Schools should have a zero-tolerance approach to child-on-child abuse. Harmful or abusive behaviour must never be dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. ([GOV.UK](https://www.gov.uk))

Child-on-child abuse is a safeguarding issue for both the child who has been harmed and the child alleged to have caused harm. Timely support may help prevent further abuse or violence.

Schools must provide clear, well-promoted, accessible systems through which children can confidently report abuse and know that they will be taken seriously. ([GOV.UK](https://www.gov.uk))

Harmful sexual behaviour (HSB) can occur between children of any age or sex, individually or in groups, online or face-to-face. Sexual behaviour exists on a continuum from developmentally expected behaviour through inappropriate or problematic behaviour to abusive or violent behaviour.

This means that in our school we ensure:

Priory maintains an attitude that “it could happen here”. Staff will remain alert to signs, disclosures, changes in behaviour and patterns of concern and will report concerns promptly to the DSL team and on CPOMS.

Staff will recognise these behaviours as potential safeguarding concerns, not simply behaviour or disciplinary matters. The context, seriousness, frequency, power imbalance, vulnerability and impact on the children involved will be considered.

All concerns will be taken seriously and harmful behaviour challenged. Pupils who report abuse will never be blamed, shamed or made to feel that they are creating a problem.

Priory will consider the safeguarding and support needs of all children involved separately. Support for a child alleged to have caused harm will never be provided at the expense of the safety or wellbeing of the child who has been harmed.

Pupils can raise concerns with any trusted adult, including form/class teachers, pastoral staff and members of the safeguarding team. Age-appropriate reporting routes, including pastoral check-ins and worry boxes where available, will be regularly explained to pupils.

The DSL will consider the child's age and developmental stage, the nature and frequency of the behaviour, consent, coercion, power imbalance, SEND or other vulnerability, and whether behaviour is isolated, escalating or part of a wider pattern.

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HSB must be considered within a **child-protection context**. ([GOV.UK](#))

When receiving a report of HSB, sexual harassment or sexual violence, children should be listened to carefully and without judgement. **Where possible**, two members of staff should manage the report, preferably including the DSL or a Deputy DSL. ([GOV.UK](#))

All incidents involving the making or sharing of **nudes or semi-nudes**, whether consensual or non-consensual and including AI-generated or altered images, require a safeguarding response. ([GOV.UK](#))

Following a report of **sexual violence**, the DSL or Deputy DSL should carry out an **immediate risk and needs assessment**. For sexual harassment, the need for an assessment should be considered case by case. Assessments must be recorded and regularly reviewed. ([GOV.UK](#))

The DSL should consider the victim's wishes, the nature of the incident, ages and development of the children, power imbalance, patterns of behaviour, ongoing risk and any links to exploitation or other safeguarding concerns. ([GOV.UK](#))

Where **rape or assault by penetration** is reported, while facts are established and safeguarding agencies are consulted, the alleged perpetrator should be removed from shared classes and reasonable separation considered elsewhere on site and during school activities. This is a safeguarding measure and **not a judgement of guilt**. ([GOV.UK](#))

For safeguarding purposes, rape includes intentional penetration of the vagina, anus or mouth with a penis without consent and without reasonable belief in consent. Assault by penetration includes intentional penetration of the vagina or anus with a part of the body or anything else, without consent and without reasonable belief in consent.

Specialist advice will be sought where required.

Staff will follow the disclosure procedures in Section 11. Where practicable, the DSL/DDSL will be involved promptly. Staff will not investigate, ask leading questions or attempt to establish guilt. The child's own words will be recorded accurately on CPOMS.

Staff must not view, copy or forward illegal sexual images of children. The DSL will manage the incident in accordance with KCSIE and current UKCIS guidance. More detailed arrangements are set out in the Online Safety section.

Priory will complete and record an appropriate Safety/Risk and Needs Assessment, considering the child who has been harmed, the alleged perpetrator, other potentially affected children, the wider school community and any unsafe locations or times. Relevant plans will be recorded on CPOMS and reviewed as circumstances change.

The child's wishes and feelings will be heard and given as much weight as reasonably possible while recognising that the School may need to take action to protect them or others. Decisions and their rationale will be recorded.

Priory will immediately consider appropriate separation and safety arrangements following reports of serious sexual violence. For other sexual harassment or violence, proximity, shared lessons, activities and movement around school will be considered on a case-by-case basis.

Staff are not expected to determine whether a criminal offence has been committed. Any report or concern involving possible rape, assault by penetration or other sexual violence will be treated as a safeguarding

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Schools should involve children's social care and/or the Police where the nature or seriousness of the incident requires it. Cases must be considered individually and immediate safeguarding action must not be delayed.

Schools should review patterns of child-on-child abuse and consider whether they indicate wider cultural, environmental, supervision or curriculum issues.

matter and referred immediately to the DSL or a Deputy DSL.

The DSL will determine whether the matter can be safely managed internally or requires CASS, Police or specialist safeguarding involvement, in accordance with KCSIE and Birmingham procedures.

The DSL and senior leaders will review incidents and CPOMS data for patterns relating to particular pupils, groups, locations, times or types of behaviour and will adjust supervision, safeguarding education, pastoral support or other arrangements where necessary.

Priory School adopts a preventative approach to child-on-child abuse through safeguarding education, effective supervision, visible and trusted staff, clear behavioural expectations and a culture in which pupils are encouraged to report concerns. Staff will challenge inappropriate sexualised, discriminatory or abusive language and behaviour at the earliest stage rather than waiting for behaviour to escalate.

Section 14 – Nudes, Semi-Nudes and Image-Based Abuse

KCSIE 2026 uses “making or sharing nudes and semi-nudes” to include photographs, videos and livestreams involving children under 18. Images may be created by the child, another person, digitally altered or wholly generated using AI, including deepfakes or deep nudes. ([GOV.UK](https://www.gov.uk/government/publications/child-safeguarding-practice-guidance))

Both consensual and non-consensual incidents require a safeguarding response. Consensual image sharing may require a different response and may not itself be abusive; non-consensual sharing is abusive. The response should be proportionate to the circumstances. ([GOV.UK](https://www.gov.uk/government/publications/child-safeguarding-practice-guidance))

Any member of staff who becomes aware of an incident should refer it to the DSL or Deputy DSL as soon as possible. ([GOV.UK](https://www.gov.uk/government/publications/child-safeguarding-practice-guidance))

In most circumstances, staff should not view the imagery. Where viewing is necessary to safeguard a child, this should be carefully controlled by the DSL and the reasons recorded. ([GOV.UK](https://www.gov.uk/government/publications/child-safeguarding-practice-guidance))

The DSL should assess whether children’s social care and/or the Police need to be involved. Abuse, coercion, exploitation, adult involvement, malicious sharing or immediate risk will require escalation. ([GOV.UK](https://www.gov.uk/government/publications/child-safeguarding-practice-guidance))

Parents and carers should normally be informed and involved at an early stage unless doing so may place a child at risk of harm. ([GOV.UK](https://www.gov.uk/government/publications/child-safeguarding-practice-guidance))

Where other agencies do not need to retain the imagery, appropriate action should be taken to prevent further

This means that in our school we will:

Priory will treat concerns involving genuine, altered or AI-generated sexual imagery of pupils as safeguarding matters and respond in accordance with KCSIE and current UKCIS guidance.

The DSL will consider the children’s age and development, consent, coercion, power imbalance, vulnerability, motivation, extent of sharing, previous concerns and any indication of grooming, exploitation, blackmail or malicious intent.

Staff will report the concern directly to the DSL team and record the safeguarding concern on CPOMS. Staff will reassure the child and will not investigate the incident themselves.

Staff must not ask a pupil to show them an image, nor copy, screenshot, print, forward, save or share it. If an image is shown unexpectedly, staff should stop further viewing and refer immediately to the DSL. Any decision that viewing is necessary will be made by the DSL and appropriately recorded.

The DSL will determine whether the matter can safely be managed within School or requires referral to CASS, Police or another safeguarding agency. Where a child is at immediate risk of harm, external safeguarding action will be taken without delay.

The DSL will normally involve parents/carers and provide appropriate advice and support. Where parental involvement could increase risk or compromise safeguarding action, the DSL will seek advice from statutory agencies before making contact.

The DSL will oversee any action relating to deletion, removal from online platforms or

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circulation, including deletion and reporting to relevant online services. Decisions must be recorded. ([GOV.UK](https://www.gov.uk))

Children involved should receive appropriate safeguarding, pastoral and educational support.

confiscated devices and will record the rationale and outcome on CPOMS. Pupils may be supported to use appropriate reporting and image-removal services where required.

Priory will support all children involved according to their needs, including consideration of safety planning, emotional wellbeing, peer relationships, online safety and whether additional safeguarding education or intervention is required.

Prevention:

Pupils will receive age-appropriate education about consent, image sharing, online relationships, coercion, exploitation and the risks associated with creating or sharing sexual imagery. Teaching will be adapted to pupils' age and developmental stage and delivered through PSHEE/RSE, Computing and wider safeguarding education.

Section 15 – Online Safety, Artificial Intelligence, Filtering and Monitoring

Technology is a significant component of many safeguarding and wellbeing issues. Online safety should be a running and interrelated theme through safeguarding, curriculum, staff training, DSL responsibilities and work with parents.

KCSIE 2026 identifies four broad areas of online risk: Content, Contact, Conduct and Commerce. The 2026 framework specifically recognises risks arising from generative AI and AI-generated material.

Content risks include exposure to illegal, inappropriate or harmful material such as pornography, racism, misogyny, self-harm, suicide, antisemitism, extremism, extreme violence, misinformation, disinformation and conspiracy theories.

Contact risks include harmful interaction with other users and, increasingly, generative AI applications which simulate human interaction. Children may be groomed or exploited sexually, criminally, financially or otherwise.

Conduct risks arise from a child's own online behaviour, including bullying, harassment and the making, sending or receiving of explicit or AI-generated images.

Commerce risks include online gambling, inappropriate advertising, phishing, fraud and financial scams.

Schools must have appropriate filtering and monitoring systems and governing bodies/proprietors should review their effectiveness at least once every academic year. Checks should include all internet-connected devices in relevant locations and a record of the review and actions should be maintained. The current DfE standard was updated again in September 2026. ([GOV.UK](https://www.gov.uk))

This means that in our school:

Priory will treat online safety as part of safeguarding rather than solely an IT matter. Concerns arising online, whether during or outside the school day, will be reported to the DSL team and recorded on CPOMS where appropriate.

Staff and pupils will be supported to recognise risks including harmful or illegal content; grooming and exploitation; online bullying and harassment; misinformation and disinformation; radicalisation; self-harm and suicide content; pornography; financial scams; and harmful or inappropriate interactions with AI systems.

Staff will remain alert to changes in pupils' behaviour, language, interests or online activity which may indicate exposure to harmful content or communities. Relevant concerns will be considered through safeguarding procedures rather than solely as technology misuse.

Pupils will be taught to recognise grooming, manipulation, coercion, impersonation and unsafe online relationships. Concerns about sextortion, online exploitation or suspicious contact will be referred immediately to the DSL team.

Harmful online behaviour will be managed through safeguarding and behaviour procedures as appropriate. Nudes, semi-nudes, deepfakes and other sexual image-based concerns are dealt with under Section 14 of this policy.

Age-appropriate online safety education will help pupils recognise financial and commercial risks and understand how and where to seek help.

Priory will maintain filtering and monitoring arrangements appropriate to the age, needs and risk profile of its pupils. The **DSL, relevant senior leader, IT support and safeguarding governor** will contribute to the annual review. Outcomes, identified gaps and actions will be documented.

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Filtering is preventative, but filtering and monitoring must not replace appropriate supervision, staff awareness, safeguarding education or professional judgement.	Alerts or concerning activity identified through monitoring will be reviewed by appropriately authorised staff and referred to the DSL where there may be a safeguarding concern. Monitoring information may also inform safeguarding education, pastoral intervention or individual safety planning.
Filtering and monitoring arrangements should take account of pupils who may be particularly vulnerable online, including children with SEND and other safeguarding vulnerabilities. (GOV.UK)	Where necessary, individual risk assessments or safety plans will consider a pupil's access to technology, communication needs, vulnerabilities and whether additional monitoring, support or reasonable adjustments are required.
Schools should avoid inappropriate over-blocking which could unreasonably restrict pupils' learning, including their ability to learn how to keep themselves safe.	Filtering arrangements will seek to provide effective protection while allowing legitimate educational access. Requests to alter filtering will be appropriately authorised and safeguarding implications considered.
Generative AI offers educational opportunities but may create safeguarding risks including harmful content, inappropriate simulated relationships, deepfakes, manipulation, misinformation, privacy breaches and exposure of personal information. DfE guidance expects schools to consider online safety and wider statutory duties whenever AI is used. (GOV.UK)	AI tools used by staff or pupils for School purposes will be subject to appropriate approval, risk assessment, age restrictions, filtering, data-protection and safeguarding controls. Staff and pupils must not place confidential, safeguarding or sensitive personal information into unapproved generative AI systems.
Schools introducing generative AI should consider whether their filtering and monitoring arrangements can manage dynamic, personalised and AI-generated content. (GOV.UK)	Priory will consider the capabilities of its filtering and monitoring systems when approving AI products or services and will review emerging risks as technology develops.
Schools must protect children's personal information and consider data protection when using AI and digital technologies.	Any School-approved digital or AI system will be considered in accordance with the School's data-protection arrangements. Where appropriate, a Data Protection Impact Assessment or other risk assessment will be undertaken before implementation.
From September 2026, schools must have regard to statutory DfE guidance on mobile phones. Schools should be mobile phone-free environments by default, with pupils not having access to mobile phones throughout the school day except where a justified exception applies. This also extends to relevant smart communication technology. (GOV.UK)	Pupils will not have access to mobile phones during the school day except where an agreed exception or reasonable adjustment applies. Smart watches, wearable devices and other technology capable of communication, internet access, photography, recording or live-streaming will be subject to the same safeguarding principles and the School's relevant behaviour/technology rules.
Wearable technology may create risks including unauthorised recording, location sharing, bullying, access	Misuse of smart watches, smart glasses, wearable cameras or similar devices will be treated as a

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to harmful content and circumvention of school filtering through independent connectivity.

Cyber security is increasingly recognised as part of safeguarding because schools hold sensitive information about children and disruption or compromise of systems can place children at risk. DfE maintains specific cyber-security standards for schools. ([GOV.UK](https://www.gov.uk))

Schools should communicate with parents and carers about online safety and the arrangements used to protect children online.

Links:

- [Keeping Children Safe in Education 2026](#)
- [Generative Artificial Intelligence in Education](#)
- [Generative AI: Product Safety Standards](#)
- [Generative AI and Data Protection in Schools](#)
- [Mobile Phones in Schools – statutory guidance](#)
- [DfE Cyber Security: Core Standard](#)

safeguarding concern where it creates or contributes to a risk of harm.

Priory will maintain appropriate cyber-security controls, access permissions, firewalls, updates, backups and incident-response arrangements to protect safeguarding information and other sensitive data.

Priory will provide parents with appropriate information and guidance on online safety, emerging technologies and digital risks, including where concerns or trends affecting pupils are identified.

Priory School currently uses NetSupport DNA for monitoring, supported by the School's Sophos firewall and filtering arrangements. Appropriate monitoring alerts are reviewed by authorised staff and safeguarding concerns are shared promptly with the DSL team. The effectiveness and suitability of these arrangements will be reviewed in accordance with the DfE Filtering and Monitoring Standards.

Section 16 - Prevent, Radicalisation and Extremism

Under section 26 of the Counter-Terrorism and Security Act 2015, schools must have due regard to the need to prevent people from becoming terrorists or supporting terrorism. The Prevent duty forms part of the School's wider safeguarding responsibilities. ([GOV.UK](https://www.gov.uk))

KCSIE 2026 defines radicalisation as the process of a person legitimising support for, or use of, terrorist violence. It recognises that there is no single profile or pathway and that staff should remain alert to changes in behaviour which may indicate a child needs help or protection.

For the purposes of KCSIE, extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Schools should take a proportionate, risk-based approach to Prevent. Every education setting should assess how pupils or staff may be at risk of radicalisation, including online, and develop actions to mitigate identified risks. ([GOV.UK](https://www.gov.uk))

Schools should have a senior designated lead responsible for delivery of Prevent and clear internal arrangements for raising concerns and making referrals. ([GOV.UK](https://www.gov.uk))

Relevant staff should receive Prevent training appropriate to their responsibilities. DSLs/Prevent leads should receive more detailed training on extremist and terrorist ideologies, referrals and Channel; the statutory guidance recommends this is refreshed at least every two years. ([GOV.UK](https://www.gov.uk))

Where concerns arise, staff should act proportionately. The official Prevent approach uses Notice, Check, Share: notice a concern, check it with the appropriate safeguarding lead/context and share it where appropriate. Prevent referrals should be based on concern that someone may be susceptible to becoming involved in terrorism or supporting it. ([GOV.UK](https://www.gov.uk))

Prevent referrals are assessed by specialist Police staff. Where appropriate, an individual may be considered by Channel, the multi-agency programme providing tailored support to people susceptible to radicalisation. ([GOV.UK](https://www.gov.uk))

This means in our school:

Priory treats concerns about radicalisation as safeguarding concerns. Staff will report concerns promptly to the DSL or a Deputy DSL and record them on CPOMS.

Staff will exercise professional curiosity and consider the child's behaviour, relationships, online activity, language, circumstances and wider context. A particular faith, culture, political view or characteristic will never in itself be treated as evidence of radicalisation.

Priory will challenge extremist narratives and intolerance while providing appropriate opportunities for pupils to discuss difficult or controversial issues safely, critically and respectfully.

Priory will maintain a **Prevent Risk Assessment and Action Plan**, informed by the School's context, local and national risks, online risks and advice from safeguarding partners. It will be reviewed regularly and updated when risks or circumstances change.

The School's Prevent Single Point of Contact (SPOC) is the DSL, Mr Declan Griffin. Deputy DSLs will support this role and ensure appropriate safeguarding cover.

Prevent awareness forms part of Priory's safeguarding training. The DSL/SPOC will undertake appropriate enhanced Prevent training at least every two years and maintain current knowledge of local risks, referral arrangements and emerging concerns.

Staff will raise concerns with the DSL team rather than attempting to determine independently whether a pupil has been radicalised. The DSL will assess the concern, seek advice where necessary and decide whether a Prevent referral, other safeguarding referral or alternative support is appropriate.

Priory will cooperate with Prevent, Police, the local authority and Channel where required and will continue to provide appropriate

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Education settings must cooperate, so far as reasonably practicable, with Channel panels where a Prevent referral has progressed to Channel. (GOV.UK) Online environments are a significant route through which children may encounter radicalising material or individuals. Prevent guidance expects schools to consider online radicalisation within their risk assessment and filtering arrangements. (GOV.UK) Schools should consider whether external speakers and events create a risk of radicalising pupils and must not provide a platform for unlawful encouragement or support of terrorism. (GOV.UK) Schools should build pupils' resilience through education, including active promotion of fundamental British values, opportunities for critical thinking and safe discussion of controversial issues. Schools must also maintain political impartiality. (GOV.UK) Links: • Prevent Duty Guidance: England and Wales • Key Principles of Prevent — 2026 • Prevent Duty: Safeguarding Learners Vulnerable to Radicalisation • Prevent Duty Training • Keeping Children Safe in Education 2026	pastoral and safeguarding support within School. Relevant information will be shared lawfully and proportionately to safeguard the child. Decisions, referrals, advice and actions will be recorded on CPOMS. Online radicalisation is considered through Priory's filtering and monitoring arrangements and Section 15 of this policy. Relevant monitoring alerts or concerns will be referred promptly to the DSL team. External speakers, organisations and events will be subject to appropriate due diligence and risk assessment before approval. Concerns about content, speakers or organisations will be referred to senior leaders and the DSL/SPOC. Through PSHEE, RE, assemblies, the wider curriculum and the School's ethos, pupils will develop critical thinking, respect for difference and the confidence to challenge prejudice, misinformation and harmful narratives in an age-appropriate way. Priory Process: Staff member notices a concern: record the facts and pass it promptly to the DSL through Priory's safeguarding procedure. The DSL considers the child's circumstances and other safeguarding needs; a staff member does not need to decide alone whether it "is Prevent". DSL checks and seeks advice: discuss the concern within the DSL team and, if useful, contact Birmingham Prevent at prevent@birmingham.gov.uk for advice. Record the information considered, advice received and decision. www.birmingham.gov.uk If referring a child: complete the National Prevent Referral Form. Birmingham's flowchart says to attach it to a Request for Support to CASS, following <i>Right Help, Right Time, and</i> email the Prevent form to CTU Gateway. Use the Trust's current professional referral route. www.birmingham.gov.uk If the child may be suffering significant harm: contact CASS immediately on 0121 303 1888
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rather than waiting for form processing. Its out-of-hours number is **0121 675 4806**. If there is immediate danger, call 999. [Birmingham Children's Trust](#)

After referral: record what was sent, to whom and when; retain the response; continue the child's safeguarding support and follow up if risk persists. A Prevent referral does not replace other safeguarding action.

Staff should not attempt to investigate radicalisation concerns themselves. They should record what they have seen, heard or been told, report it promptly to the DSL/SPOC and allow the DSL to determine the appropriate safeguarding response. Where there is an immediate risk of harm or terrorism-related activity, the Police will be contacted without delay.

Section 17 - Exploitation, Gang Affiliation and Serious Violence

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity. Exploitation may occur in person or online and may involve violence, threats, coercion or an exchange for something the child needs or wants.

A child cannot consent to being exploited, abused or trafficked. Children who are criminally exploited should have their vulnerabilities recognised and should be treated as victims, including where they appear to have committed criminal offences.

CCE can take many forms, including county lines, drug distribution, carrying or transferring money, theft, financial crime, working in cannabis factories, vehicle crime and being coerced into threatening or committing serious violence. Children may carry weapons because they are being exploited or because they believe this is necessary for protection.

County lines describes gangs or organised criminal networks using children or vulnerable people to move drugs or money, commonly using dedicated phone lines or other forms of “deal line”.

CSE is a form of child sexual abuse and can involve physical or non-contact sexual activity, grooming, sexual imagery and online exploitation. A child may not understand or recognise that they are being exploited and may believe they are in a genuine relationship.

Exploitation increasingly takes place or begins online, including through social media, gaming, messaging platforms and other digital environments.

At Priory School this means:

Any concern that a pupil may be experiencing exploitation will be treated as a safeguarding concern, reported promptly to the DSL team and recorded on CPOMS. Staff will consider the wider context of a child’s behaviour rather than viewing offending, risky or sexualised behaviour solely as misconduct.

Priory will adopt a child-first approach. Apparent choice or participation will not prevent staff from considering grooming, coercion, fear, debt, manipulation, control or exploitation.

Staff will remain alert to indicators including unexplained money or possessions, multiple phones or SIM cards, unexplained travel, changes in friendships, association with older or controlling individuals, increased secrecy or fear, unexplained injuries, missing episodes and significant changes in attendance, behaviour or engagement. Indicators will be considered together and in context.

Concerns about county lines involvement will be referred immediately to the DSL. The DSL will consider the child’s immediate safety, missing episodes, threats to the child or family, peer associations, online contact and whether Children’s Social Care and/or Police involvement is required.

Concerns about sexual exploitation will be managed through child-protection procedures. The DSL will consider age and development, power imbalance, coercion, relationships, online activity, image sharing and any links with criminal exploitation, trafficking or other abuse.

Online indicators will be taken as seriously as face-to-face concerns. Staff will consider unexplained changes in online behaviour, secretive communication, contact with unknown or controlling individuals, requests to share

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Exploitation may involve trafficking or modern slavery. The National Referral Mechanism (NRM) is the UK framework for identifying and supporting potential victims of exploitation and modern slavery. Missing episodes can be an important warning sign of exploitation. Children may go missing from home, care or education because of grooming, coercion or control. Serious violence may include physical assault, robbery, carrying, threatening with or using weapons, gang-associated violence and serious peer conflict. Children involved in violence may themselves be experiencing exploitation or other forms of harm. Indicators of increased risk of serious violence can include increased absence, changes in friendships or relationships with older individuals or groups, declining educational performance, self-harm or deterioration in wellbeing, unexplained injuries, gifts or possessions. Risk may also be increased by disrupted education or previous experiences of maltreatment or violence. Risk of serious violence may be heightened before and after the school day and in particular locations within the wider community. Schools should seek to understand their local context and work with partners to promote safety. Where there is concern about weapon carrying, threats or serious violence, the DSL should assess the risk to the individual child and others and consider appropriate safety and support planning. Effective responses to exploitation and serious violence require multi-agency working and use of local safeguarding procedures and tools.	locations or images, threats, promises of money or status and other signs of online grooming. Where trafficking or modern slavery is suspected, the DSL will follow child-protection procedures, seek appropriate specialist advice and consider or support referral through the National Referral Mechanism. Priory will cooperate with any Independent Child Trafficking Guardian or other professional supporting the child. Missing or unexplained absence will be considered alongside all other safeguarding information. Staff will ensure links between attendance, missing episodes and possible exploitation are identified and shared promptly with the DSL. Serious violence will not automatically be treated solely as a behaviour matter. Concerns involving weapons, serious assault, threats of violence or escalating peer conflict must be reported immediately to the DSL or a Deputy DSL. The DSL will consider the child's full safeguarding picture, including attendance, previous concerns, relationships, SEND, mental health, exploitation risk, experiences of abuse and any involvement with other services. Priory will consider information from pupils, parents, staff, Police and safeguarding partners when identifying locations or periods of heightened risk. Appropriate action may include safety planning, supervision, changes to collection/travel arrangements and multi-agency support. Priory will complete an appropriate risk/safety and support plan where required. This may include measures to reduce peer conflict, manage movement or contact, increase supervision and involve Children's Social Care, Police or other specialist services. Priory follows the Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance. Relevant Birmingham exploitation and youth-violence screening, risk-assessment and triage tools will be used to inform assessment, decision-
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Where a child is suffering or is likely to suffer harm, referral to Children's Social Care and, where appropriate, the Police must be made immediately.

- Department for Education – Keeping Children Safe in Education 2026 – CCE, CSE, modern slavery and serious violence.
- Birmingham City Council – Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance 2018.
- Birmingham Safeguarding Children Partnership – Right Help, Right Time, January 2025 (Version 6).
- Home Office – Criminal Exploitation of Children and Vulnerable Adults: County Lines, updated October 2023.
- Home Office – Modern Slavery: Statutory Guidance for England and Wales, updated August 2026, including the National Referral Mechanism arrangements.
- Home Office – Serious Violence Duty: Preventing and Reducing Serious Violence, Statutory Guidance, December 2022.
- Youth Endowment Fund – Violence Prevention Toolkit

making and referrals to CASS and other safeguarding partners where concerns exist.

The DSL will coordinate referrals wherever practicable, but safeguarding action will not be delayed to complete an assessment tool or gather further evidence. Immediate risk will be referred to CASS and/or Police without delay.

Priory School will seek to reduce the risk of exploitation and serious violence through early identification, trusted relationships, effective attendance monitoring, safeguarding education and timely intervention. Pupils will receive age-appropriate education about grooming, coercion, county lines, criminal and sexual exploitation, unsafe peer influence, weapon carrying and how to seek help.

Priory School follows the Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance and Birmingham Safeguarding Children Partnership procedures. The DSL team will use the relevant Birmingham screening and risk-assessment tools where exploitation, gang affiliation or serious youth violence is suspected. These tools support professional judgement and referral; they do not replace the requirement to act immediately where a child is suffering or is likely to suffer harm.

Section 18 - Children Absent from Education and Children Missing Education

Children being absent from education, particularly repeatedly and/or for prolonged periods, can be a vital warning sign of safeguarding concerns. These may include abuse, neglect, sexual or criminal exploitation, county lines, mental health concerns, substance misuse, radicalisation, FGM, honour or faith-based abuse and forced marriage.

Schools should identify absence early and follow up unexplained absence promptly. Current statutory attendance guidance requires schools to work with pupils and families to understand and address barriers to attendance. ([GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Attendance-Guidance-2016.pdf))

The safeguarding significance of absence will vary according to the individual child and their circumstances.

Children who are frequently absent, on part-time timetables, repeatedly removed from lessons, experiencing multiple suspensions or at risk of exclusion may require additional support. KCSIE 2026 specifically identifies these circumstances as potential indicators of need.

Where a child's whereabouts or welfare cannot be established, schools should make reasonable enquiries and work jointly with the local authority. Current CME guidance gives examples including contacting parents, relevant agencies, siblings' schools, previous schools and other local authorities where appropriate. ([GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Attendance-Guidance-2016.pdf))

Where there is reason to believe that absence indicates that a child is suffering or likely to suffer harm, normal attendance processes must not delay safeguarding action.

At Priory School this means:

Priory will not treat attendance and safeguarding as separate processes. Unexplained, repeated or prolonged absence will be considered within the child's wider safeguarding context and escalated to the DSL team where appropriate.

Attendance will be recorded and monitored daily. Unexplained absence will be followed up promptly, using available contact details and more than one method of contact where necessary. Priory will maintain at least two emergency contacts for pupils wherever reasonably possible.

Staff will consider known vulnerabilities including **SEND, health or mental health needs, social care involvement, looked-after status, domestic abuse, exploitation, Family Help involvement, temporary accommodation, previous missing episodes and other existing safeguarding concerns** when determining the urgency of the response.

Attendance, pastoral, SEND and safeguarding information will be considered together. Where absence indicates wider unmet need, Priory will consider school-based support, Family Help, statutory intervention or specialist services as appropriate.

Priory will make and document reasonable enquiries to establish the child's whereabouts and welfare. Contact attempts, information received, decisions and actions will be recorded. Where enquiries are unsuccessful or concerns increase, the DSL and relevant senior staff will determine the appropriate escalation.

Concerns will be referred to CASS and/or the Police without delay where appropriate. If there is immediate danger, the Police will be contacted on 999. A CME referral does not replace a child-protection referral.

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A Child Missing Education (CME) is a child of compulsory school age who is not registered at a school and is not receiving suitable education otherwise.

Schools must work with the local authority where a child is or may become CME and should continue to undertake reasonable enquiries even after referring the child to the local authority CME service. ([GOV.UK](https://www.gov.uk))

A pupil must only be removed from the admission register where a lawful ground for deletion under the School Attendance (Pupil Registration) (England) Regulations 2024 has been met and all required enquiries and notifications have been completed. ([GOV.UK](https://www.gov.uk))

Specific statutory requirements apply where a pupil has failed to return following authorised leave or has been continuously absent without authorisation. Current guidance requires joint reasonable enquiries by the school and local authority before certain grounds for deletion can be used. ([GOV.UK](https://www.gov.uk))

Where parents choose Elective Home Education (EHE), schools must follow the statutory admission-register requirements and inform the local authority as required.

The Children's Wellbeing and Schools Act 2026 introduced a duty on local housing authorities to notify schools, with the required consent, when a child is placed in temporary accommodation. This is intended to enable earlier safeguarding and welfare support.

Children who are looked after, missing from care or otherwise particularly vulnerable may require an immediate and enhanced response to absence.

Priory will distinguish between a pupil who is absent and a child who is genuinely CME. A pupil who remains on Priory's roll does not become CME simply because their attendance is persistently or severely poor, although their absence may still represent a serious safeguarding concern.

Where a child may be missing education, Priory will work with the Birmingham Children Missing Education Service, School Admissions, Elective Home Education services and, where relevant, Children's Social Care, the Virtual School and the child's social worker.

Priory will not remove a pupil from roll simply because they have stopped attending or their whereabouts are unknown. Required returns and notifications will be made to Birmingham City Council and appropriate reasonable enquiries undertaken before deletion from the register.

Priory will follow the current statutory attendance and CME guidance rather than applying an arbitrary number of days before safeguarding action is taken. Risk, vulnerability and the circumstances of the absence will determine how quickly concerns are escalated.

Priory will follow Birmingham's current EHE procedures. Any existing safeguarding concerns will be shared appropriately with the local authority and/or Children's Social Care and will not be considered resolved simply because the child is withdrawn from School.

Where Priory receives a temporary-accommodation notification, relevant safeguarding, attendance and pastoral staff will consider the impact on the child's welfare, attendance, transport, learning and support needs and take appropriate action. Such a notification does not replace a safeguarding referral where the child has been harmed or is at risk of harm.

Where a looked-after child, child with a social worker or other highly vulnerable pupil is unexpectedly absent, Priory will liaise

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Birmingham CME contact details are:

Children Missing Education Service

Telephone: 0121 303 4983

Email: cme@birmingham.gov.uk

Key guidance

- Department for Education – Keeping Children Safe in Education 2026
- Department for Education – Working Together to Improve School Attendance, updated July 2026
- Department for Education – Children Missing Education: Statutory Guidance for Local Authorities and Schools, updated September 2025
- School Attendance (Pupil Registration) (England) Regulations 2024
- Children’s Wellbeing and Schools Act 2026 – Temporary Accommodation Notification Duty, in force from 1 September 2026
- Birmingham City Council – Children Missing Education procedures
- West Midlands Safeguarding Children Procedures – Children Missing from Education, Home or Care

promptly with the relevant parent/carer, social worker, Virtual School and other agencies according to the child’s individual safeguarding plan and level of risk.

Priory School will work with Birmingham City Council’s Children Missing Education Service where a child’s whereabouts are unknown or where there is concern that a child may not be receiving suitable education. The School will continue to undertake reasonable enquiries and fulfil its safeguarding responsibilities after making a CME referral. Where there are concerns that a child has suffered or is likely to suffer harm, a referral to CASS and/or the Police will be made separately and without delay.

Section 19 – Mental Health and Safeguarding

Mental health problems can, in some circumstances, develop into safeguarding concerns. Self-harm, suicidal ideation and risk of suicide may themselves raise safeguarding concerns. Mental health difficulties may also indicate that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals should diagnose mental health conditions. School staff are nevertheless well placed to observe children regularly and recognise changes which may indicate emerging difficulty.

Potential warning signs may include significant changes in behaviour, persistent sleep difficulties, withdrawal from social situations, loss of interest in previously enjoyed activities, physical signs of self-harm or self-neglect and other significant changes in presentation. These signs do not automatically mean that a child has a mental health condition or is suicidal.

At Priory School this means:

Staff will consider a child’s mental health within the wider safeguarding picture. Where a mental health concern is also, or may become, a safeguarding concern, staff will speak promptly to the DSL or a Deputy DSL and record the concern on CPOMS.

Staff are not expected to diagnose mental illness. They are expected to notice, listen, record and act on concerns about a pupil’s presentation, behaviour, wellbeing or functioning.

Staff will use professional curiosity and consider changes in context. Concerns will be considered alongside attendance, behaviour, relationships, family circumstances, SEND, previous safeguarding information and the child’s own wishes and feelings.

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Particular attention is required where a child is self-harming, showing signs of an eating disorder, experiencing suicidal ideation or expressing plans or intention to end their life.

([GOV.UK](https://www.gov.uk))

If staff believe that a child is in danger, KCSIE 2026 states that they should call 999 or arrange for the child to be taken immediately to A&E by a parent/carer or another suitable person. If urgent mental-health help is required but the situation is not an emergency, help can be obtained through NHS 111 online or by calling 111 and selecting the mental health option.

Schools should ensure that interventions they provide are evidenced as safe and effective and appropriate to the child's need and phase of education. ([GOV.UK](https://www.gov.uk))

Schools have a role in providing early targeted support and in liaison with or referral to appropriate specialist services. KCSIE 2026 specifically encourages liaison between the DSL, Senior Mental Health Lead and Mental Health Support Team where available. ([GOV.UK](https://www.gov.uk))

Parents and carers should normally be involved in supporting a child's mental health where doing so would not place the child at additional risk. ([GOV.UK](https://www.gov.uk))

Where risk is significant or ongoing, individual safety and support arrangements may be required.

Mental-health concerns should not be considered in isolation from a child's experiences. Trauma, abuse, neglect, exploitation, discrimination, bullying, family circumstances

Concerns involving self-harm, suicidal thoughts or plans, significant eating difficulties or other risk of serious harm will be passed directly to the DSL/DDSL. The child will not be left unsupported while immediate risks and next steps are considered.

Priory will not delay emergency medical or mental-health assistance while waiting for an internal process or external referral. 999/A&E will be used where there is immediate danger; NHS 111 Mental Health will be used where urgent help is required but there is no immediate emergency.

Priory will provide proportionate pastoral and wellbeing support within the competence of school staff. Staff will not provide therapeutic or clinical interventions for which they are not appropriately trained. Specialist support will be sought where a child's needs exceed the School's provision.

The DSL team, Mental Health Leads, pastoral staff, SENCo and other appropriate colleagues will work together so that safeguarding, SEND, educational and mental-health needs are considered holistically. Priory will work with Forward Thinking Birmingham, Mental Health Support Teams, GPs, NHS services, Family Help and other specialist services as appropriate.

Parents/carers will normally be contacted and involved in planning support. Where there is reason to believe that parental involvement may increase safeguarding risk or compromise the child's safety, the DSL will seek appropriate safeguarding advice before making contact.

The DSL, Mental Health Lead and relevant staff will consider an individual Safety and Support Plan where there is significant self-harm, suicidal ideation, suicide risk or another serious mental-health concern. This may identify immediate risks, protective measures, trusted adults, communication arrangements, professional involvement and clear review/escalation arrangements.

Priory will adopt a trauma-informed and child-centred approach, considering what may be underlying a pupil's behaviour or presentation rather than assuming

and other adverse experiences may significantly affect a child's emotional wellbeing and behaviour.

Schools have an important role in promoting good mental wellbeing and preventing the onset or escalation of mental-health difficulties. ([GOV.UK](https://www.gov.uk))

Safeguarding and mental-health information should be recorded and shared appropriately so that relevant staff can support the child and emerging patterns are identified.

Key guidance:

- Department for Education – Keeping Children Safe in Education 2026, paragraphs 47–50 and 226–234.
- Department for Education – Mental Health and Behaviour in Schools, 2018.
- Department for Education – Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges.
- Department for Education – Relationships Education, Relationships and Sex Education (RSE) and Health Education, statutory guidance, revised 2026.
- NHS 111 – urgent mental-health support
- Forward Thinking Birmingham – children and young people's mental-health services, 0–25.

difficulties are simply behavioural or disciplinary.

Mental health and emotional wellbeing will be promoted through PSHEE/RSE, pastoral provision, assemblies, relationships with trusted adults and the wider curriculum. Pupils will be taught age-appropriate strategies for recognising emotions, developing resilience and seeking help.

Relevant concerns, discussions, professional advice, referrals, actions, Safety and Support Plans and outcomes will be recorded on CPOMS. Information will be shared on a need-to-know basis in accordance with safeguarding and information-sharing requirements.

Where a pupil discloses self-harm, suicidal thoughts or an intention or plan to end their life, staff must take the disclosure seriously, remain with or ensure appropriate supervision of the child, and contact the DSL or a Deputy DSL immediately. Staff must not attempt to determine the level of clinical risk themselves. Where the child is in immediate danger, 999 will be called or the child will be taken immediately to A&E by a parent/carer or another suitable person. Where urgent mental-health assistance is required but the situation is not an emergency, NHS 111 Mental Health will be contacted.

Section 20 - Children with Additional Vulnerabilities and Specific Safeguarding Risks

Priory School recognises the specific safeguarding issues identified in Keeping Children Safe in Education 2026 and will consider these in accordance with the relevant sections of this policy. These include child abduction and community safety incidents; children and the court system; children absent from education; children with family members in prison or affected by parental offending; child criminal exploitation; child sexual exploitation; county lines; modern slavery and trafficking; cybercrime; domestic abuse; fabricated or induced illness; faith-based abuse; female genital mutilation; forced marriage; homelessness; mental health; nudes and semi-nudes; child-on-child abuse; preventing radicalisation; serious violence; sexual violence and sexual harassment; and other safeguarding circumstances identified within current statutory guidance.

These issues are addressed throughout this policy and should not be considered in isolation. Staff must remain alert to overlapping risks and consider whether apparently separate concerns form part of a wider safeguarding picture.

20.1 Children who may require additional safeguarding consideration

All children can experience abuse, neglect or exploitation, but some children may face additional risk or additional barriers to recognising, reporting or disclosing harm. Safeguarding responses should take account of the individual child's needs, experiences and circumstances.

Children with SEND, disabilities, health conditions or medical needs can face additional safeguarding challenges both online and offline. These may include communication difficulties, dependence on adults, intimate care, peer isolation, prejudice-based bullying and assumptions that changes in behaviour, mood or injury arise from the child's condition.

Children who are non-verbal, minimally verbal or have communication difficulties may find it particularly difficult to describe abuse, recognise abusive behaviour or seek help.

A child having, or having previously had, a social worker may indicate that they have experienced adversity and may remain vulnerable to further harm and poorer educational outcomes.

Looked-after and previously looked-after children may have experienced abuse, neglect, disrupted attachments or instability. Their safeguarding and educational needs should be considered together.

Local authorities retain responsibilities towards children who cease to be looked after and become care leavers, including appointing a Personal Adviser and maintaining a pathway plan. KCSIE 2026 requires the DSL to have details of the

At Priory School this means:

Priory will consider each child's individual circumstances and will not assume that the same safeguarding response is appropriate for every child. Staff will remain professionally curious and consider whether apparently separate concerns form part of a wider pattern.

Staff must not attribute concerning behaviour, injury, distress or changes in presentation automatically to SEND, disability or a medical condition. Where appropriate, the DSL will work closely with the SENCo, health professionals and other specialists, and communication will be adapted to enable the child's voice to be heard.

Safeguarding concerns will still be recorded and acted upon even where a pupil cannot provide a verbal account. Appropriate communication aids, visuals, signs, devices or specialist advice will be used where required. Changes in behaviour or presentation may themselves communicate distress.

The DSL will maintain appropriate oversight of children with current or previous social-care involvement and ensure relevant safeguarding information informs support, attendance monitoring, reasonable adjustments and educational planning.

Priory's Designated Teachers will work with the DSL, carers, social workers and Virtual School Head as appropriate. Safeguarding and educational information will be considered together and unnecessary disclosure of a child's care status will be avoided.

Where a Priory pupil is a care leaver, the DSL will maintain the contact details of the child's Personal Adviser and liaise with them

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relevant Personal Adviser and liaise with them where necessary.

Young carers may experience pressures which affect attendance, attainment, behaviour, emotional wellbeing and participation in school life. Early identification is important so that support can be provided at the right time.

Children with a parent or carer in custody, or who are affected by parental offending, may experience stigma, instability, poverty, absence or emotional distress.

Family circumstances such as domestic abuse, parental mental ill-health, substance misuse, homelessness or significant instability may substantially affect a child's welfare and ability to engage with education.

A child being lesbian, gay or bisexual is not in itself a safeguarding risk, but children who are, or are perceived to be, lesbian, gay or bisexual may be vulnerable to discriminatory bullying or harassment.

Discrimination and prejudice can create additional vulnerability and barriers to seeking help.

20.2 Children questioning their gender and requests for social transition

A child questioning their gender is not, in itself, a safeguarding concern. Schools should take time to understand the child's thoughts and feelings and remain professionally curious about the full range of their experiences, including possible mental-health, psychosocial, family, peer or bullying concerns.

Schools should **not initiate social transition**. The KCSIE 2026 provisions apply where a child or their parent/carers asks the School to make changes or provide support to facilitate the child presenting as the opposite biological sex. Individual staff members should not adopt such changes independently.

as necessary where safeguarding, welfare, attendance or educational concerns arise.

Staff will be alert to children undertaking significant caring responsibilities. Priory will offer proportionate pastoral support, reasonable adjustments and Family Help or specialist young-carer support where appropriate.

Staff will respond sensitively and maintain appropriate confidentiality. Pastoral, attendance and safeguarding support will be considered according to the child's individual circumstances, without stigmatising the child because of a family member's behaviour.

These circumstances will be considered as part of the child's wider safeguarding picture. Priory will consider school-based support, Family Help and statutory referral according to the child's needs and level of risk.

Priory will challenge homophobic, biphobic and other discriminatory bullying or harassment. Staff will respond sensitively to pupils seeking support and consider any associated safeguarding or wellbeing concerns in accordance with this policy.

Priory will take seriously safeguarding concerns connected with race, religion or faith, disability, sex, sexual orientation or other protected characteristics. Prejudice-based harm will not be dismissed solely as a behaviour matter.

Priory will listen to children sensitively and without judgement and will remain alert to any associated safeguarding, mental-health, wellbeing or bullying concerns. The School will maintain a culture in which all pupils are treated with dignity and harmful or discriminatory behaviour is challenged.

Any request for support with social transition will be referred to the Headteacher and DSL. Individual members of staff must not independently introduce or

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Decisions about requests for support with social transition must be made carefully, considering the **welfare and best interests of the child and other children**, safeguarding duties, equality and human-rights obligations and all relevant circumstances. The decision-making process should be documented and records maintained.

Schools should consider the full range of factors affecting the child, including age and development, health, neurodiversity, family and peer relationships and any relevant clinical or other professional advice. **Primary schools should exercise particular caution**, and KCSIE states that support for full social transition at primary age would be expected to be agreed very rarely.

Parents and carers should be actively involved and their views treated with importance. In the rare circumstances where involving a parent or carer would create a greater safeguarding risk to the child, the DSL should determine what safeguarding action is required before contact is made or decisions are taken.

Where a child talks to a member of staff about questioning their gender but **does not ask the School to make changes to how they are treated**, there is no reason to break confidence unless there is an associated safeguarding risk.

KCSIE 2026 requires schools to maintain sex-specific arrangements for **toilets, changing rooms and boarding/residential accommodation**. Pupils must not use facilities designated for the opposite biological sex. Suitable alternative arrangements may be made where necessary to protect privacy, dignity and welfare.

agree changes relating to a pupil's social transition.

Priory will consider requests on an individual basis and document the decision-making process, advice obtained, factors considered and any agreed arrangements. Decisions will be kept under review as the child's needs or circumstances change.

Priory will adopt a very careful, child-centred approach appropriate to the pupil's age and developmental stage when responding to any request relating to social transition. The School will consider the individual circumstances of the child, including their safeguarding, wellbeing, SEND, health, family and peer circumstances and any relevant professional advice. The DSL, SENCo and other relevant professionals will be involved where appropriate. Staff will not undertake clinical assessment or advise on matters outside their professional competence.

Priory will normally involve parents/carers as a matter of priority when considering a request for social transition. Where there is reason to believe that parental involvement may place the child at risk of harm, the DSL will seek appropriate safeguarding advice before parents/carers are contacted.

Staff will listen and provide appropriate pastoral support. Information will only be shared where necessary for safeguarding or support purposes and in accordance with Sections 21 and 22 of this policy.

Priory will maintain sex-specific toilets, changing rooms and shower facilities in accordance with current statutory requirements. Pupils will not use toilets, changing rooms or showers designated for the opposite biological sex. Where an individual pupil requires additional privacy, appropriate alternative arrangements will be considered which protect the safety, privacy, dignity and welfare of all pupils.

Sport and physical activity

Where sporting activities are organised separately by sex, Priory will consider the safety, fairness and privacy of all pupils

Schools should ensure that relevant staff have the correct information required to fulfil their safeguarding duties and must accurately record a child's biological sex where sex is recorded.

20.3 Domestic abuse

Domestic abuse may occur between partners, former partners or family members and can take place inside or outside the home. Children may experience significant harm even where they are not themselves physically assaulted.

Police information concerning domestic abuse may be shared with schools to enable timely support for affected children.

when determining participation arrangements. Where a sport is organised in single-sex groups because this is necessary for pupils' safety, there will be no exceptions: pupils must not participate in the group designated for the opposite biological sex. Decisions will take account of the nature of the activity, the age and developmental stage of pupils, physical differences which may be relevant to safety or competitive fairness, safeguarding considerations and the School's legal obligations.

Requests concerning participation in sex-separated sporting activities will be considered individually by appropriate senior leaders and will not be agreed informally by individual members of staff. Where necessary, the School will seek appropriate professional or legal guidance before determining arrangements. Any agreed provision will seek to support the individual pupil while safeguarding the safety, privacy, dignity and fair participation of other pupils.

Priory will ensure that information necessary to safeguard a pupil is accurate and available to relevant staff on a need-to-know basis. Any support arrangements will be managed sensitively and with appropriate regard to confidentiality, safeguarding and data protection.

Any information indicating that a child is experiencing the effects of domestic abuse will be treated as a safeguarding concern. The DSL will consider the child's immediate safety, emotional wellbeing, family circumstances and whether Family Help or statutory intervention is required.

Priory will respond promptly to Operation Encompass notifications. Information will be restricted to those who need it to safeguard and support the child, and appropriate support will be available during the school day.

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Domestic abuse can occur in children and young people's own intimate relationships and may overlap with child-on-child abuse.

20.4 Honour or faith-based abuse, FGM and forced marriage

All forms of honour or faith-based abuse are abuse regardless of the motivation. They may involve a wider family or community network and can include FGM, forced marriage and other harmful practices.

Female Genital Mutilation (FGM) is illegal and is child abuse. Teachers have a personal statutory duty under section 5B of the Female Genital Mutilation Act 2003 to report to the Police where, in the course of their professional duties, they discover through disclosure or visual evidence that FGM appears to have been carried out on a girl under 18.

The mandatory FGM reporting duty does not apply merely because FGM is suspected or a girl is believed to be at risk. Normal safeguarding procedures apply in those circumstances.

A forced marriage is a marriage entered into without the full and free consent of one or both parties. It is also an offence to cause a child to marry before their eighteenth birthday, even where coercion is not used.

20.5 Private fostering

A private fostering arrangement occurs when a child under 16, or under 18 if disabled, is cared for for 28 days or more by someone who is not their parent, a person with parental responsibility or a close relative, under a private arrangement rather than one made by the local authority.

20.6 Homelessness and temporary accommodation

Homelessness or the risk of homelessness can present a **real risk to a child's welfare**. Contact with housing services does not replace a referral to Children's Social

Where relevant, Priory will follow the child-on-child abuse procedures in Section 13 alongside any wider domestic-abuse safeguarding response.

Any concern will be reported immediately to the DSL/DDSL. Staff will not contact family or community members themselves where doing so could increase risk or compromise safeguarding action.

A teacher to whom the mandatory reporting duty applies will personally make the Police report. The DSL should also be informed unless there is a good reason not to do so, and wider child-protection action will be considered. Staff must never examine a pupil to establish whether FGM has occurred.

Any suspicion or risk of FGM will still be reported immediately to the DSL, recorded on CPOMS and referred to Children's Social Care and/or Police where appropriate.

Concerns about forced marriage will be referred immediately to the DSL. Priory will seek specialist advice, including from the Forced Marriage Unit, and will not attempt family mediation where this could place the child at increased risk.

Where Priory becomes aware of a known or suspected private fostering arrangement, the DSL will establish whether Birmingham Children's Trust has been notified and will ensure that notification is made where required. Any additional safeguarding concerns will be dealt with separately through the normal safeguarding procedures

Where a pupil or family is homeless, threatened with homelessness or placed in temporary accommodation, the DSL will consider the impact on safeguarding,

Care where there is concern that a child has suffered or is likely to suffer harm.

20.7 Other specific safeguarding circumstances

Children and the court system: Children may be required to give evidence in criminal courts or may be affected by family court proceedings. Such experiences can be stressful or traumatic and may affect a child's wellbeing, behaviour and education.

Child abduction and community safety: Child abduction may involve removal of a child from someone with lawful control of them or attempted abduction by another person. Wider community-safety concerns may include suspicious approaches to children or unsafe locations.

Cybercrime: Children with particular interests or skills in computing may become involved in cyber-dependent crime, including unauthorised access to systems, denial-of-service attacks or the creation or distribution of malware. Such behaviour may indicate vulnerability as well as offending.

Fabricated or induced illness: A parent or carer may fabricate, exaggerate or deliberately cause symptoms of illness in a child. Staff should treat concerns as safeguarding matters and should not attempt to establish themselves whether an illness or symptom is genuine.

Key guidance:

- Department for Education – Keeping Children Safe in Education 2026
- Domestic Abuse Act 2021 and associated statutory guidance
- Operation Encompass
- Multi-agency Statutory Guidance on Female Genital Mutilation
- Female Genital Mutilation Act 2003 – mandatory reporting duty
- The Right to Choose: Government Guidance on Forced Marriage

attendance, transport, health, wellbeing and access to education. Priory will work with relevant housing and children's services where appropriate. Referral to housing services will never replace a safeguarding referral where the child has been harmed or is at risk of harm.

Priory will provide appropriate pastoral support and act upon any associated safeguarding concerns. Age-appropriate resources and specialist support will be used where appropriate.

Concerns involving attempted abduction, suspicious approaches or other significant community-safety incidents will be reported immediately to the DSL and Police where appropriate. Pupils will receive age-appropriate personal-safety education which develops practical skills and confidence to seek help.

Where a child appears to be becoming involved in cyber-dependent offending, the DSL will consider safeguarding vulnerabilities and appropriate education or diversionary support, including **Cyber Choices**, where appropriate.

Where staff suspect that a child's illness, symptoms or presentation may be fabricated, exaggerated or induced, they will report the concern to the DSL. Staff will not investigate or challenge the parent/carers themselves.

Where additional vulnerabilities or specific safeguarding circumstances are identified, Priory will consider whether an individual Safety and Support Plan is required. This may identify risks, protective measures, trusted adults, communication needs, reasonable adjustments, professional involvement and review arrangements. Plans and significant safeguarding actions will be recorded appropriately on CPOMS.

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- Children Act 1989 – private fostering arrangements
- Department for Education – Private Fostering: Statutory Guidance for Local Authorities
- Equality Act 2010
- Human Rights Act 1998
- Birmingham Safeguarding Children Partnership procedures
- West Midlands Safeguarding Children Procedures

abuse facilitated through the intern

Section 21 - Confidentiality and Information Sharing

Effective information sharing is essential to identifying need, preventing concerns from escalating and protecting children from abuse, neglect and exploitation. Schools should be **proactive in sharing relevant information as early as possible.** ([GOV.UK](https://www.gov.uk))

Safeguarding information is confidential, but confidentiality does not mean secrecy. Staff should maintain an appropriate level of confidentiality by involving only those who need to be involved. Staff must never promise a child that information about abuse, neglect or exploitation will be kept secret. ([GOV.UK](https://www.gov.uk))

The relevant data protection legislation comprises the **Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025**. These laws do not prevent information being shared for safeguarding purposes. ([GOV.UK](https://www.gov.uk))

From **30 September 2026**, the statutory Information Sharing Duty under **section 16LA of the Children Act 2004** requires relevant organisations to share information where they consider it relevant to safeguarding or promoting a child's welfare and sharing may help another relevant organisation assess need, make a decision, provide support or take safeguarding action. A child does not need to meet a particular statutory threshold before relevant information can be shared. ([GOV.UK](https://www.gov.uk))

Consent is not generally required where there is a lawful basis or statutory duty to share information for safeguarding purposes. Lack of consent, parental objection or fear of

At Priory School this means:

Safeguarding information will be shared promptly with the DSL team and, where appropriate, with Children's Social Care, Police, health professionals, other education settings and safeguarding partners. Staff must not assume that another person or agency will share information that may be critical to a child's safety.

Staff will explain to children, in an age-appropriate way, that information may need to be shared with people who can help keep them safe. Safeguarding information will only be discussed with appropriate people and will not be shared unnecessarily.

Staff must not allow uncertainty about data protection to delay necessary safeguarding information sharing. Where staff are unsure, they should seek prompt advice from the DSL/DDSL and, where necessary, the School's Data Protection Officer.

Priory will comply with the statutory Information Sharing Duty and relevant local multi-agency arrangements. Information relevant to emerging need, Family Help or prevention will be shared where required; information sharing will not be reserved only for cases where a Section 17 or Section 47 threshold has already been reached.

Priory will normally be open with children and families about information sharing where it is safe and appropriate to do so. However, information may be shared

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complaint are not, by themselves, reasons to withhold relevant safeguarding information. ([GOV.UK](https://www.gov.uk))

Data protection legislation allows the sharing of special category personal data without consent in appropriate circumstances through the safeguarding of children and individuals at risk processing condition. ([GOV.UK](https://www.gov.uk))

When deciding what to share, information should be relevant, necessary, proportionate, accurate, timely, securely shared and appropriately contextualised. Schools should not omit information where doing so could prevent the recipient from properly understanding or managing safeguarding risk. ([GOV.UK](https://www.gov.uk))

The new statutory duty contains a very limited exception where sharing information would be more detrimental to the child than not sharing it. Decisions not to share for this reason should be exceptional, carefully considered and recorded. ([GOV.UK](https://www.gov.uk))

Information should be shared securely and only with those who require it for an appropriate safeguarding purpose.

Decisions about whether to share or withhold safeguarding information should be recorded, including the rationale, recipient and purpose.

Data protection law permits schools to withhold personal information in response to a Subject Access Request where the serious harm test is met. KCSIE gives the example of protecting information that could reveal the location of a child in a refuge or emergency accommodation. ([GOV.UK](https://www.gov.uk))

Uncertainty about information sharing must not delay urgent safeguarding action.

without consent or prior notification where the law permits or requires this and safeguarding the child makes sharing necessary.

Sensitive information, including health, SEND and safeguarding information, will be shared where there is an appropriate safeguarding purpose and lawful basis. Only information relevant to that purpose will be disclosed.

Priory will distinguish clearly between fact, professional opinion and information received from another person. Information shared will provide sufficient context for the recipient to understand its significance without including unnecessary personal information.

Where the DSL considers that sharing particular information could itself create a greater risk to a child, the DSL will consider whether that risk can be reduced by limiting, sanitising or restricting access to the information. Any decision to withhold relevant safeguarding information will be exceptional, clearly justified, recorded and reviewed.

Safeguarding records will be maintained within **CPOMS** and other approved secure systems. Staff must not routinely use personal email accounts, informal messaging services or other unauthorised methods to communicate confidential safeguarding information.

Significant information-sharing decisions will be recorded on CPOMS, including what information was shared, with whom, why it was shared, any advice sought and, where relevant, why information was not shared.

Any Subject Access Request involving safeguarding information will be considered with the **Data Protection Officer and DSL** before information is released. Information will be withheld or redacted where required by law to protect the child or another person from serious harm.

Where a child is in immediate danger or may be suffering significant harm, staff will take the necessary safeguarding action immediately. Advice about information governance can be obtained alongside or

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Key guidance:

- Keeping Children Safe in Education 2026, particularly paragraphs 140–150
- Department for Education – Information Sharing Duty: Statutory Guidance, September 2026, effective 30 September 2026
- Children Act 2004, section 16LA, as amended by the Children’s Wellbeing and Schools Act 2026
- Data Protection Act 2018
- UK General Data Protection Regulation
- Data (Use and Access) Act 2025
- Working Together to Safeguard Children
- ICO – guidance on sharing information to safeguard children and young people
- DfE – Data Protection in Schools

after the immediate protective action where necessary.

The safety and welfare of the child is the central consideration when sharing safeguarding information. Priory School will share relevant information confidently, lawfully, proportionately and securely, and will not allow fears about confidentiality or data protection to prevent appropriate safeguarding action.

Section 22 - Record Keeping and Transfer of Safeguarding Records

All safeguarding concerns, discussions, decisions and the reasons for those decisions should be recorded in writing. Records should be clear, accurate, factual and sufficiently detailed to demonstrate what happened and how the concern was addressed.

Safeguarding records should contain a clear and comprehensive summary of the concern, details of how it was followed up and resolved, and a note of actions taken, decisions reached and the outcome.

Records should distinguish clearly between fact, observation, professional opinion and information received from another person.

A child's wishes, feelings and lived experience should inform safeguarding decision-making and be appropriately recorded.

At Priory School this means:

Priory uses CPOMS as its principal safeguarding recording system. Safeguarding concerns will be recorded promptly and, wherever possible, on the same day. An urgent concern must also be brought directly to the attention of the DSL/DDSL; making a CPOMS entry does not replace immediate verbal reporting where action is required.

CPOMS entries will record what was seen, heard or disclosed; relevant dates and times; actions taken; discussions with the child, family or professionals; referrals; decisions and outcomes. Where a decision is made not to refer or escalate a concern, the rationale will also be recorded.

Staff will use objective language and record the child's own words wherever possible. Professional judgements will be identified as such, and the source of information provided by another person will be clear. Staff will avoid speculation or unnecessary subjective language.

Where relevant, CPOMS records and safeguarding plans will identify what the child has said, what they would like to

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Safeguarding records should create a coherent picture of concerns over time so that patterns, escalation and cumulative harm can be identified. Safeguarding information must be held confidentially, safely and securely, with access restricted to those who need it for safeguarding purposes. The DSL has responsibility for ensuring that safeguarding records are appropriately maintained, reviewed and managed. Where a child moves to another school or college, their child-protection file must be transferred securely and separately from the main pupil file. KCSIE requires safeguarding records to be transferred as soon as possible and within five days for an in-year transfer, or within the first five days of the start of a new term. Where safeguarding concerns are significant or complex, relevant information may need to be shared before the child's arrival so that appropriate safeguarding arrangements can be made. Information transferred should enable the receiving setting to understand current concerns, relevant context and ongoing support needs. Historical information should be appropriately contextualised so that it supports safeguarding rather than unfairly disadvantaging the child. Where information indicates that a child may present a risk to themselves or others, the receiving school needs sufficient	happen and how their views have been considered in decisions affecting them. The DSL team will maintain appropriate chronologies through CPOMS and will review patterns across attendance, behaviour, wellbeing, online activity, peer relationships and previous safeguarding concerns rather than considering incidents solely in isolation. Safeguarding, child-protection and welfare information is held within the pupil's secure CPOMS record/vault, separate from the general academic record. Access is restricted according to role and safeguarding need. The DSL will maintain oversight of the quality of safeguarding records and ensure that significant concerns have appropriate actions, decisions and outcomes recorded. The DSL team will periodically review records to identify outstanding actions or developing patterns of concern. The DSL will arrange the secure transfer of Priory's safeguarding information directly to the DSL or appropriate safeguarding lead at the receiving setting. Safeguarding records will not be routinely included within the ordinary academic pupil file. Priory will work to these timescales. Transfer will be documented and confirmation of receipt obtained and retained, providing an auditable record that the safeguarding information has reached the receiving setting. Where there are significant concerns, Children's Social Care involvement, substantial risk to the child or others, or continuing safeguarding plans, the Priory DSL will speak directly to the receiving DSL in advance wherever practicable. This will allow necessary support, supervision or safety arrangements to be in place when the child arrives. Priory will provide a clear safeguarding summary where appropriate, identifying current concerns, significant history, professional involvement, existing plans and actions still required. Records will distinguish historical concerns from current risk. Where relevant, information about serious violence, weapon-related concerns, harmful
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information to undertake appropriate assessment and planning.

When Priory receives safeguarding information from another setting, it should be reviewed promptly and relevant staff made aware of information they need in order to safeguard and support the pupil.

Where safeguarding records cannot be transferred to another education setting — for example where a child moves abroad or becomes electively home educated — they must continue to be securely retained and appropriately archived.

Safeguarding records should only be retained, transferred, archived or destroyed in accordance with applicable legal requirements and records-retention guidance.

Key guidance:

- Keeping Children Safe in Education 2026 – safeguarding record keeping and transfer
- Working Together to Safeguard Children
- DfE Information Sharing Duty: Statutory Guidance 2026
- Data Protection Act 2018
- UK GDPR
- Data (Use and Access) Act 2025
- Birmingham Safeguarding Children Partnership procedures
- Priory School Data Protection / Records Retention arrangements

sexual behaviour, exploitation or other significant risks will be discussed directly with the receiving DSL so that an appropriate Safety and Support Plan can be considered before or upon admission.

The DSL will review incoming safeguarding records, establish any necessary contact with the previous setting or professionals and ensure appropriate support is in place. Relevant information will be shared with staff such as the SENCo, pastoral staff, form/class teacher or other professionals only where they need it to safeguard or support the child.

Priory will retain and archive such records securely in accordance with its records retention schedule, Data Protection Policy and Data Management procedures. Access to archived safeguarding records will remain restricted.

Electronic safeguarding systems and archived records will be managed securely. Priory will ensure appropriate arrangements are in place for access, retention, secure transfer, archiving and eventual destruction of safeguarding records.

When a pupil leaves Priory School, the DSL will establish the receiving education setting and ensure that the child-protection/safeguarding record is transferred securely and separately from the main pupil file. Transfer will take place as soon as possible and within five days for an in-year transfer, or within the first five days of the start of a new term. Confirmation of receipt will be obtained and retained.

Where safeguarding concerns are significant or complex, or statutory services are involved, the DSL will also make direct DSL-to-DSL contact before the child's transfer wherever practicable so that appropriate safeguarding arrangements can be prepared in advance.

A safeguarding record is not complete simply because a concern has been logged. Where appropriate, the record must demonstrate what happened next: actions taken, discussions held, decisions reached,

reasons for those decisions, referrals made, responses received, follow-up undertaken and the eventual outcome.

Section 23 - Concerns and Allegations About Adults, Low-Level Concerns and Whistleblowing

23.1 Concerns or allegations that may meet the harm threshold

These procedures apply to concerns or allegations about any adult working in or on behalf of the School, including employees, supply staff, trainee teachers, volunteers and contractors.

The harm threshold may be met where an adult has: harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child or children in a way indicating they may pose a risk of harm; or behaved, or may have behaved, in a way indicating they may not be suitable to work with children. The final criterion can include behaviour outside school. ([GOV.UK](https://www.gov.uk))

Concerns or allegations about a member of staff should normally be reported to the Headteacher. A concern about the Headteacher should be referred to the Chair of Governors. Where there is a conflict of interest in reporting to the person who would normally receive the concern, it should be reported directly to the LADO. ([GOV.UK](https://www.gov.uk))

The School should understand and follow its local authority arrangements for managing allegations. Before contacting the LADO, limited basic enquiries may be undertaken to establish simple facts, but these must not jeopardise a Police or Children's Social Care investigation. ([GOV.UK](https://www.gov.uk))

The Case Manager should discuss the nature, content and context of the allegation with the LADO and agree the appropriate course of action. ([GOV.UK](https://www.gov.uk))

At Priory School this means:

Any concern about the conduct of an adult working with children at Priory must be reported immediately through the appropriate route below. Staff must not investigate the matter themselves.

Where any of these criteria may apply, the concern will be treated as a potential allegation meeting the harm threshold rather than as a low-level concern. Behaviour outside work will also be considered where it raises questions about an adult's suitability to work with children.

The Headteacher will act as Case Manager for allegations about adults working at Priory. Where the allegation concerns the Headteacher, the Chair of Governors will act as Case Manager. Where the normal reporting route is compromised by a conflict of interest, staff may contact Birmingham LADO directly.

The Case Manager may establish basic information such as whether the adult was present, whether contact could have occurred, whether witnesses exist or relevant CCTV is available. This is not an investigation. The individual concerned, child or witnesses will not be extensively questioned before appropriate advice is obtained.

Where the harm threshold may be met, the Case Manager will contact the Birmingham Local Authority Designated Officer (LADO) and follow the advice and local allegations-management process. The DSL will ensure that the child's immediate safeguarding and welfare needs are addressed.

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Where there is cause to suspect that a child is suffering or likely to suffer significant harm, Children's Social Care and/or the Police may need to become involved without delay.

The School has separate responsibilities for protecting the child and managing the allegation concerning the adult. The DSL normally oversees the child's welfare, while the Case Manager manages the allegation with the LADO. ([GOV.UK](https://www.gov.uk))

Suspension must not be an automatic response. It should only be considered where the circumstances warrant it, including where children may be at risk, and alternatives should first be considered. ([GOV.UK](https://www.gov.uk))

Allegations concerning supply teachers, trainee teachers and contracted staff remain the School's safeguarding responsibility even where another organisation employs the individual. The School must work with the relevant agency/provider. ([GOV.UK](https://www.gov.uk))

Investigations must continue to an appropriate conclusion even if the individual resigns or ceases to provide services. Settlement agreements must not prevent appropriate safeguarding investigation or statutory referrals. ([GOV.UK](https://www.gov.uk))

The recognised outcomes are substantiated, malicious, false, unsubstantiated or unfounded. An unsubstantiated allegation does not imply either guilt or innocence. ([GOV.UK](https://www.gov.uk))

Where relevant statutory criteria are met, employers have duties concerning referral to the Disclosure and Barring Service (DBS) and consideration of referral to the Teaching Regulation Agency (TRA). ([GOV.UK](https://www.gov.uk))

Allegation records have specific retention and reference requirements. Records other than those found to be malicious

Safeguarding the child takes priority over employment procedures. CASS and/or Police referrals will be made immediately where required, and action will not be delayed while awaiting the outcome of an employment process.

The DSL/DDSL will ensure appropriate support and safety arrangements are in place for the child. The Case Manager will manage the adult allegations process and will ensure the individual concerned is also appropriately supported and informed, subject to advice from the LADO, Police or Children's Social Care.

The Case Manager will consider proportionate alternatives such as redeployment, additional supervision, alternative duties or removal from particular contact before suspension. Any decision to suspend, and alternatives considered, will be clearly documented.

Priory will gather the relevant facts and manage the safeguarding process with the LADO while working closely with the employing agency, teacher-training provider or contractor. Priory will not simply stop using an individual and regard the matter as resolved.

Resignation, dismissal, termination of a placement or ending a contract will not bring the safeguarding process to an end. Priory will continue to cooperate with the LADO and relevant agencies and reach and record an outcome wherever possible.

The final outcome and rationale will be clearly recorded using the appropriate KCSIE terminology. Where allegations are deliberately invented or malicious, appropriate action may be considered, while also considering whether the person making the allegation requires safeguarding support.

Following a substantiated allegation or other relevant safeguarding outcome, Priory will consider and make required DBS referrals and, for teaching staff, consider referral to the TRA. These duties apply even where the individual has resigned or otherwise left.

Allegation records will be held securely on the appropriate confidential personnel

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or false should normally be retained until the individual reaches normal pension age or for 10 years from the date of the allegation, whichever is longer. ([GOV.UK](https://www.gov.uk))

Schools should review cases and identify any lessons for policy, practice, training or safeguarding culture.

Birmingham Local Authority Designated Officer (LADO)

Telephone: **0121 675 1669**

Email: ladoteam@birminghamchildrenstrust.co.uk

23.2 Concerns that do not meet the harm threshold – Low-Level Concerns

A low-level concern may relate to conduct inside or outside work and can arise through observation, suspicion, a complaint, a disclosure, information from another person or information identified during vetting.

Examples can include being overly friendly with children, having favourites, taking photographs on a personal device, inappropriate one-to-one working, humiliating pupils or other conduct inconsistent with professional boundaries. ([GOV.UK](https://www.gov.uk))

Schools should create a culture of openness, trust and transparency in which staff feel confident to report concerns and to self-refer where their own behaviour could have been misinterpreted or fallen below expected professional standards. ([GOV.UK](https://www.gov.uk))

Schools may determine whether concerns are initially shared with the Headteacher or DSL, but the Headteacher should be the ultimate decision-maker for low-level concerns. ([GOV.UK](https://www.gov.uk))

safeguarding record, not as an ordinary pupil CPOMS record. References will comply with KCSIE requirements: substantiated safeguarding allegations meeting the harm threshold will be included factually where required; false, unfounded, unsubstantiated or malicious allegations will not be included.

At the conclusion of an allegation, the Case Manager will consider with the LADO where appropriate whether changes to procedures, supervision, training, staff conduct expectations or other safeguarding arrangements are required.

Staff should report behaviour that causes concern or unease even where they are uncertain whether it is sufficiently serious to constitute an allegation. Staff are not responsible for deciding the threshold before reporting.

The Staff Code of Conduct provides the expected standards of professional behaviour. A breach or apparent breach may constitute a low-level concern, a pattern of concerns or an allegation depending on the circumstances and level of risk.

Priory encourages self-referral where staff believe they may have crossed a professional boundary, made an error of judgement or placed themselves in a situation that could reasonably be misinterpreted. Self-reporting will be treated openly and proportionately; it does not automatically result in disciplinary action.

Low-level concerns should normally be reported as soon as possible to the Headteacher. Where the Headteacher is unavailable, they may be reported to the DSL, who will ensure the Headteacher is informed appropriately. Concerns about the Headteacher must be reported to the Chair of Governors.

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Where there is doubt about whether a concern actually meets the harm threshold, the School should consult the LADO.

([GOV.UK](#))

Low-level concerns about supply staff and contractors should be shared with their employer so that wider patterns can be identified. ([GOV.UK](#))

All low-level concerns must be recorded in writing, including the concern, its context, action taken and the rationale for decisions. Records must be confidential and securely held.

([GOV.UK](#))

Records should be reviewed to identify patterns of concerning, inappropriate or problematic behaviour. A pattern may require disciplinary action or may collectively meet the harm threshold and require LADO referral.

([GOV.UK](#))

KCSIE recommends retaining low-level concern records at least until the individual leaves employment. They should generally not be included in references unless the concern or group of concerns meets the harm threshold and is substantiated, or relates to matters such as misconduct or poor performance that would ordinarily be included.

([GOV.UK](#))

23.3 Whistleblowing and concerns about safeguarding practice

All staff and volunteers should feel able to raise concerns about poor or unsafe safeguarding practice, wrongdoing or failures within the School's safeguarding arrangements. KCSIE requires appropriate whistleblowing procedures to be in place. ([GOV.UK](#))

Priory will err on the side of seeking LADO advice where the threshold is unclear. A concern will not be deliberately categorised as "low-level" simply to avoid the allegations-management process.

Where the adult is employed or supplied by another organisation, Priory will inform that organisation and cooperate in considering the concern.

Priory will maintain a secure Low-Level Concerns Record, separate from ordinary pupil safeguarding records. Records will be factual and include dates, context, relevant evidence, action taken and the reason for the outcome reached.

The Headteacher will review previous concerns relating to the individual before reaching a decision. Patterns and wider safeguarding-culture issues will be considered, and concerns will be escalated to the LADO where the harm threshold may now be met.

Priory will retain records securely for at least the individual's period of employment and longer where required under its records-retention arrangements or because the concern has become part of a wider allegations process. References will follow KCSIE requirements.

The Headteacher will provide the Safeguarding Governor with appropriate anonymised assurance about the operation of the low-level concerns process, including themes, patterns and implications for policy, culture or training. The Safeguarding Governor's role is strategic and does not normally involve reviewing individual low-level concern case files.

Priory will maintain a culture in which staff can raise genuine safeguarding concerns without fear of victimisation or disadvantage. Staff will be made aware of the School's Whistleblowing Policy and reporting routes through induction and safeguarding training.

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Concerns should normally be raised through the School's internal procedures, but alternative routes must be available where the concern involves the person who would ordinarily receive it.

Where a member of staff feels unable to raise a concern internally, or believes a genuine safeguarding concern is not being addressed, external whistleblowing channels are available, including the NSPCC Whistleblowing Advice Line. ([GOV.UK](https://www.gov.uk))

Whistleblowing procedures do not replace the duty to take immediate action where a child is at risk of harm.

Key guidance:

- Keeping Children Safe in Education 2026 – Part Four: Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors
- Working Together to Safeguard Children 2026
- Birmingham Safeguarding existing appendix already in Children Partnership – Managing Allegations / Position of Trust procedures
- Birmingham Local Authority Designated Officer procedures
- Disclosure and Barring Service – Making Barring Referrals
- Teaching Regulation Agency – Teacher Misconduct guidance
- Priory School Staff Code of Conduct
- Priory School Whistleblowing Policy

Concerns will normally be raised with the Headteacher. Concerns involving the Headteacher should be raised with the Chair of Governors. Where these routes are inappropriate because of a conflict of interest, staff may use the School's alternative external reporting arrangements or seek advice from the LADO where the matter concerns safeguarding.

Staff may contact the NSPCC Whistleblowing Advice Line – 0800 028 0285 where they feel unable to raise a safeguarding concern internally or believe that appropriate action has not been taken.

Where a child may be in immediate danger or suffering harm, staff must follow the safeguarding procedures in this policy, including direct referral to CASS or the Police where necessary. A concern about organisational practice must never delay action to protect a child.

Priory School expects all adults working in or on behalf of the School to maintain the highest standards of professional conduct and safeguarding practice. All concerns about adults will be taken seriously, managed fairly and proportionately and addressed promptly. The welfare of children will remain the paramount consideration while ensuring that those who are the subject of concerns or allegations are treated fairly and supported appropriately.

Section 24 - Alternative Provision, External Providers and Use of School Premises

At Priory School this means:

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Where a school places a pupil with an Alternative Provision (AP) provider, the school continues to be responsible for safeguarding that pupil and must be satisfied that the placement is safe, suitable and meets the pupil's individual needs. ([GOV.UK](#))

Schools should obtain written confirmation from the AP provider that appropriate safeguarding checks have been carried out on individuals working at the setting — equivalent to those the commissioning school would otherwise undertake itself. ([GOV.UK](#))

KCSIE 2026 also requires written confirmation that the AP provider will notify the commissioning school of arrangements which may put the child at risk, including relevant staffing changes, so that the school can assure itself that appropriate checks have been completed on new staff. ([GOV.UK](#))

A provider's inclusion on a local authority framework or approved list does not remove the commissioning school's responsibility to undertake its own safeguarding checks and due diligence. KCSIE refers schools to the DfE's voluntary national standards for non-school AP. ([GOV.UK](#))

Schools should always know where a pupil is during school hours, including the address of the AP provider and any subcontracted provision or satellite sites attended by the pupil. ([GOV.UK](#))

AP placements should be reviewed frequently enough to ensure that the pupil is attending regularly and that the placement remains safe, suitable and effective. KCSIE specifies reviews at least half-termly. ([GOV.UK](#))

Where safeguarding concerns arise in AP, the placement should be reviewed immediately and terminated where necessary unless or until the concerns have been satisfactorily addressed. ([GOV.UK](#))

Before commissioning AP, Priory will undertake appropriate due diligence and safeguarding checks and consider whether the placement is suitable for the individual pupil's educational, SEND, health, behavioural and safeguarding needs.

Priory will obtain and retain written assurance that required recruitment and safeguarding checks have been completed. These arrangements should be confirmed before the pupil begins attending wherever practicable.

Commissioning arrangements will require providers to inform Priory promptly of significant safeguarding changes, including changes to relevant staff, location or provision. Priory will seek further safeguarding assurance where circumstances change.

Priory will not rely solely on another organisation's approval or quality-assurance process. The School will satisfy itself that the provider and individual placement are appropriate, including consideration of the DfE Non-School Alternative Provision Voluntary National Standards where relevant. ([GOV.UK](#))

Priory will maintain accurate records of the pupil's timetable, expected attendance, location and contact details for each provision used. A pupil must not be moved to another site or subcontracted provision without Priory being informed and satisfied with the arrangements.

Every AP placement commissioned by Priory will be formally reviewed at least half-termly. Reviews will consider attendance, safeguarding, wellbeing, educational progress, pupil voice and whether the placement continues to meet the child's needs. Regular contact will be maintained with the pupil, family and provider as appropriate.

Safeguarding concerns relating to an AP placement will be reported immediately to the Priory DSL. The School will reassess risk and, where necessary, suspend or terminate the placement and arrange alternative provision while concerns are addressed.

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Commissioners and providers should establish clear arrangements for reporting safeguarding concerns, sharing information and responding to incidents. The DfE national standards emphasise that responsibility for progressing concerns should be agreed and documented. ([GOV.UK](#))

Where external organisations or individuals are commissioned to provide activities or services for Priory pupils, appropriate safeguarding arrangements and staff suitability must be established.

Where an activity or service is provided by the School under the direct supervision or management of Priory staff, the School's child-protection arrangements apply. ([GOV.UK](#))

Where an organisation or individual independently provides activities on the School's premises, the School must seek assurance that the provider has appropriate safeguarding and child-protection policies and procedures, inspecting these where necessary, and ensure arrangements exist for liaison on safeguarding matters. This applies whether or not the children attending are Priory pupils. ([GOV.UK](#))

Where School premises are hired or rented to another organisation or individual, safeguarding requirements should form a condition of any lease, hire or transfer-of-control agreement. Failure to comply should result in termination of the agreement. ([GOV.UK](#))

Providers of after-school clubs, tuition, sports training and other out-of-school activities should have appropriate arrangements for safeguarding, staff suitability, health and safety and governance. Current DfE guidance for out-of-school settings was updated in February 2026. ([GOV.UK](#))

Where the School receives an allegation concerning an individual or organisation using Priory premises to provide activities for children, KCSIE requires the School to follow its own safeguarding procedures, including informing the LADO. ([GOV.UK](#))

Appropriate referrals to CASS, Police or LADO will be made where required.

Priory will establish a named safeguarding contact at the provider and make clear how concerns, disclosures, incidents, attendance issues and changes in risk are to be communicated. Relevant safeguarding information will be shared lawfully and proportionately so that the provider can keep the child safe.

Before pupils work with external coaches, tutors, instructors, therapists, activity providers or similar professionals arranged through the School, Priory will establish appropriate safeguarding, vetting, supervision and reporting arrangements. Relevant safer-recruitment requirements are set out in Section 6.

School-run clubs, activities and provision will operate under this Safeguarding and Child Protection Policy and Priory's normal safeguarding reporting arrangements.

Priory will obtain appropriate safeguarding assurance before permitting an external organisation to provide activities for children on School premises. This will include consideration of safeguarding procedures, staff suitability, arrangements for reporting concerns and a named safeguarding contact.

Priory's letting and hire arrangements will contain clear safeguarding expectations. The School reserves the right to suspend or terminate use of its premises where safeguarding requirements are not met or where concerns cannot be satisfactorily resolved.

Priory will expect relevant external providers to operate in accordance with current DfE safeguarding guidance for out-of-school settings and any other regulatory requirements applicable to their provision.

Any such allegation will be reported immediately to the Headteacher and managed in accordance with Section 23. The Birmingham LADO will be consulted where appropriate, even where the individual concerned is not employed by Priory.

Key guidance:

- Department for Education – Keeping Children Safe in Education 2026, paragraphs 208–215
- Department for Education – Alternative Provision: Statutory Guidance, updated February 2025
- Department for Education – Non-School Alternative Provision: Voluntary National Standards, August 2025
- Department for Education – After-school Clubs, Community Activities and Tuition: Safeguarding Guidance for Providers, updated February 2026
- Keeping Children Safe in Education 2026 – Part Four, where an allegation concerns an individual or organisation using school premises

Commissioning an alternative provision placement does not transfer Priory School's safeguarding responsibility for the pupil. The School will maintain oversight of the child's attendance, location, welfare, safeguarding and educational progress throughout the placement and will act immediately where concerns arise.

Where an external provider delivers a club, activity or service involving Priory pupils, the respective safeguarding responsibilities of the School and provider will be established before the activity begins. Providers must know how to report a safeguarding concern relating to a Priory pupil and how to contact the School's safeguarding team.

Section 25 - Early Years Foundation Stage Safeguarding and Welfare Arrangements

The EYFS safeguarding and welfare requirements apply to Priory's early years provision alongside KCSIE 2026 and the safeguarding arrangements set out throughout this policy. Providers must take all necessary steps to keep children safe and well. ([GOV.UK](https://www.gov.uk))

Every EYFS setting must have a practitioner designated to take lead responsibility for safeguarding. All practitioners must remain alert to concerns affecting a child at home or elsewhere. ([GOV.UK](https://www.gov.uk))

EYFS safeguarding procedures must cover concerns about children, allegations about adults, staff suitability, mobile phones/cameras and electronic devices, and safeguarding training. ([GOV.UK](https://www.gov.uk))

EYFS practitioners must receive safeguarding training meeting the criteria in Annex C of the EYFS framework and must be supported to implement safeguarding procedures confidently. Training must be renewed at least every two years. The DSL must also receive appropriate training and provide ongoing advice and support. ([GOV.UK](https://www.gov.uk))

At Priory School this means:

All safeguarding procedures within this policy apply fully to children in Priory's EYFS provision. The additional requirements in this section reflect the particular age, developmental needs and vulnerability of younger children.

The School DSL retains overall safeguarding responsibility, supported by the DDSLs and the Early Years safeguarding leadership. EYFS staff know how to contact the DSL team and will report concerns without delay in accordance with Sections 4 and 11.

These requirements are addressed through this policy, the Staff Code of Conduct, safer-recruitment arrangements, the EYFS mobile-device procedures and other relevant School policies.

All EYFS practitioners will receive safeguarding training and induction appropriate to their role. EYFS-specific safeguarding training will be renewed at least every two years, alongside the School's annual safeguarding updates and ongoing briefings required under KCSIE.

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Providers must put appropriate arrangements in place for the supervision of staff who have contact with children and families. Supervision should support staff to discuss children's development, wellbeing and child-protection concerns. ([GOV.UK](#))

Providers must ensure that adults caring for children are suitable, appropriately qualified and subject to the required vetting checks. Childcare-disqualification requirements also apply where relevant. ([GOV.UK](#))

EYFS staffing arrangements and statutory staff:child ratios must meet children's needs and ensure their safety. Children must usually be within sight and hearing of staff and must always be within sight or hearing. ([GOV.UK](#))

Every child must be assigned a key person who helps ensure that their care is tailored to their individual needs, supports a settled relationship and builds an effective relationship with parents/carers. ([GOV.UK](#))

At least one person with a current full Paediatric First Aid (PFA) certificate must be on the premises and available whenever children are present and must accompany children on outings. PFA certification must be renewed every three years. ([GOV.UK](#))

During meals and snacks, children must be appropriately supervised. The EYFS requires a member of staff with a current full PFA certificate to be in the room while children are eating. Children must always be within sight and hearing while eating. ([GOV.UK](#))

EYFS providers must follow up unnotified and prolonged absence promptly, including attempts to contact parents/carers and alternative emergency contacts. The child's vulnerability, family circumstances and patterns of absence must inform the response. ([GOV.UK](#))

EYFS safeguarding policies must state how mobile phones, cameras and other devices capable of imaging and sharing are used within the setting. ([GOV.UK](#))

EYFS staff will receive appropriate supervision which provides opportunities to discuss safeguarding, children's wellbeing, professional practice, training and any concerns arising through their work with children and families.

Priory will follow the safer-recruitment and ongoing-suitability procedures in Section 6, together with all additional EYFS suitability, qualification and disqualification requirements. Staff must disclose information which may affect their continuing suitability to work with children.

Priory will maintain the statutory ratios, qualifications and supervision requirements applicable to each part of its EYFS provision. Deployment will take account of individual children's needs, activities, environment and level of risk rather than relying solely on minimum ratios.

Each EYFS child will have a designated key person who knows the child well, communicates effectively with their parents/carers and helps identify emerging needs or safeguarding concerns at an early stage.

Priory will ensure appropriate PFA cover at all times within EYFS and on off-site visits and will maintain records of current qualifications. Staffing arrangements will ensure a qualified person can respond quickly in an emergency.

EYFS eating arrangements will provide active supervision and appropriate PFA cover. Staff will know children's allergies, intolerances, dietary and health requirements, and relevant allergy action plans will be maintained and shared with those who need to know.

The attendance and safeguarding procedures in Section 18 apply to EYFS children. Unexplained or concerning absence will be followed up promptly and escalated to Children's Social Care and/or the Police where there are concerns about a child's welfare or whereabouts.

Personal mobile phones, cameras and other personal imaging devices will not be used by staff while caring for EYFS children and will

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The privacy and dignity of children during nappy changing, toileting and intimate care must be balanced with their safeguarding and support needs. ([GOV.UK](https://www.gov.uk))

From September 2026, the EYFS contains strengthened requirements relating to safer sleeping arrangements. Children must be placed down to sleep safely and remain appropriately supervised; specific statutory requirements apply to children under two. ([GOV.UK](https://www.gov.uk))

Providers must take reasonable steps to ensure that children are not exposed to risks and must be able to demonstrate how risks are being managed. This includes premises, equipment, visitors, outings and the safe collection of children. ([GOV.UK](https://www.gov.uk))

From September 2026, banned dog breeds, including XL Bully types, must not be kept or present on premises providing EYFS childcare, even where the animal has an exemption certificate. ([GOV.UK](https://www.gov.uk))

From September 2026, providers must have regard to current DfE guidance on children's screen use in early years settings. ([GOV.UK](https://www.gov.uk))

Physical intervention must never be used as punishment. Where intervention is absolutely necessary to prevent injury or manage immediate danger, the incident must be recorded and parents/carers informed on the same day or as soon as reasonably practicable. ([GOV.UK](https://www.gov.uk))

Safeguarding and welfare records must be accurate, secure and accessible only to those who have a right or professional need to see them. EYFS providers must maintain appropriate two-way information sharing with parents/carers and other professionals. ([GOV.UK](https://www.gov.uk))

be stored in accordance with the School's EYFS mobile-device procedures. Photographs or recordings of children will only be made using authorised equipment and for approved purposes, subject to the School's permissions and data-protection arrangements.

Intimate care will be undertaken sensitively and in accordance with Priory's Intimate Care procedures, maintaining appropriate professional boundaries, dignity and safeguarding practice. Staff will remain alert to any injuries, behaviour or disclosures giving rise to safeguarding concern.

Where sleep is provided, Priory will follow the current EYFS safer-sleep requirements and relevant NHS guidance. Where children under two are cared for, the specific sleeping arrangements, supervision and safe-sleep requirements in paragraph 3.86 of the EYFS framework will be followed in full.

Priory will maintain appropriate risk assessments, supervision, visitor controls and collection arrangements. Children will only be released to individuals authorised by their parent/carer and will not be permitted to leave EYFS provision unsupervised.

Priory will ensure that no prohibited dog breed is present within premises being used to provide EYFS childcare.

Any use of screens or digital technology within EYFS will be purposeful, age-appropriate, appropriately supervised and consistent with DfE guidance. Wider online-safety and filtering arrangements are set out in Section 15.

EYFS staff will follow Section 8 – Restrictive Interventions, including Reasonable Force. Any physical intervention will be necessary, proportionate and recorded, and parents/carers will be informed in accordance with the EYFS requirements.

EYFS safeguarding concerns will be recorded on CPOMS and managed in accordance with Sections 21 and 22. Relevant safeguarding and welfare information will be shared appropriately with parents, professionals and other settings attended by the child.

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Key guidance:

- Department for Education – Early Years Foundation Stage Statutory Framework for Group and School-Based Providers, effective 1 September 2026
- Department for Education – Keeping Children Safe in Education 2026
- Working Together to Safeguard Children
- Prevent Duty Guidance
- Early Years Qualification Requirements and Standards, effective 1 September 2026
- DfE – Help for Early Years Providers: Screen Use
- NHS – safer sleep/SIDS guidance
- DfE/BSACI guidance on allergies and safer eating

Allegations or concerns about adults working with EYFS children will be managed in accordance with Section 23 and KCSIE 2026. Where Priory's EYFS provision is subject to Ofsted registration, the registered provider will also notify Ofsted of any allegation of harm or abuse by a person living, working or looking after children at the premises, together with the action taken, as soon as reasonably practicable and in any event within 14 days, as required by the EYFS statutory framework. Any additional notification requirements applying to the School or its inspectorate will also be followed.

Priory recognises that babies and younger children may be unable to identify, understand or verbally communicate that they are experiencing harm. EYFS practitioners will therefore remain particularly alert to changes in behaviour, emotional presentation, development, interaction, attendance, physical presentation and relationships with adults or other children. Concerns will be considered within the child's developmental stage and wider family circumstances and acted upon promptly.

APPENDICES

Appendix 1 – Definitions and Indicators of Abuse, Neglect and Exploitation

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery and understand that children can be at risk of harm inside or outside school, inside or outside the home, and online.

Abuse, neglect, exploitation and other safeguarding issues are rarely standalone events. In many cases, a child may experience several forms of harm at the same time. Technology may also facilitate abuse or exploitation that occurs both online and offline.

The indicators listed in this appendix are not exhaustive and must not be used as a checklist. The presence of one or more indicators does not prove that abuse has occurred, and the absence of obvious signs does not mean that a child is safe.

Staff are not responsible for investigating or establishing proof. Where something a member of staff sees, hears, notices or is told causes concern about a child, they should exercise professional curiosity and follow the safeguarding procedures set out in this policy.

Abuse

Abuse is a form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm.

Harm may include physical and non-physical ill-treatment and the impact of seeing, hearing or otherwise experiencing the ill-treatment of another person. Children may be abused within a family, institutional or community setting; by people known to them or, more rarely, by others.

Abuse may take place wholly online, or technology may be used to facilitate abuse offline. A child may be abused by an adult or adults or by another child or children. Children may also cause harm to other members of their family, including child-to-parent or caregiver abuse.

Physical Abuse

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

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

Possible indicators may include:

- unexplained injuries, bruises, burns, bites or other marks;
- injuries which are inconsistent with the explanation given;
- changing or inconsistent explanations of how an injury occurred;

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- injuries which appear unusual for the child's age, development or mobility;
- repeated injuries or patterns of injury;
- injuries in unusual locations or with a recognisable shape or pattern;
- unexplained covering of the body or reluctance to change for PE or swimming;
- fear of going home or of parents/carers being contacted;
- fearfulness around particular adults;
- flinching or an unusual response to physical contact;
- significant withdrawal, aggression or changes in behaviour; or
- signs that illness may have been fabricated or deliberately induced.

Any injury to a **non-mobile child**, or an injury which is unusual in light of a child's physical ability or developmental stage, should be considered particularly carefully.

Emotional Abuse

Emotional abuse is the **persistent emotional maltreatment of a child** which causes severe and adverse effects on the child's emotional development.

It may include:

- making a child feel worthless, unloved, inadequate or valued only insofar as they meet another person's needs;
- persistent criticism, belittling, humiliation or name-calling;
- preventing a child from expressing their views or deliberately silencing or ridiculing them;
- imposing expectations which are inappropriate for the child's age or development;
- overprotection or preventing normal exploration, learning or social interaction;
- causing a child to see or hear the ill-treatment of another person;
- serious bullying, including cyberbullying;
- making a child frequently feel frightened or in danger; or
- exploitation or corruption of the child.

Some level of emotional abuse is involved in all types of maltreatment, although emotional abuse may also occur on its own.

Possible indicators may include:

- significant withdrawal, anxiety or low self-esteem;
- the child consistently describing themselves in very negative terms;
- excessive fear of making mistakes or an extreme reaction to mistakes;
- delayed emotional, social or developmental progress;
- unusual levels of compliance, passivity or attention-seeking;
- significant changes in mood or behaviour;
- difficulties forming or maintaining relationships;
- persistent fearfulness or hypervigilance;
- regression or behaviour which is unusual for the child's developmental stage;
- self-harm or other behaviour indicating emotional distress;
- running away or avoidance of home;
- persistent sleep or eating difficulties; or
- a sudden or significant reduction in communication.

Sexual Abuse

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Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities, whether or not violence is involved and whether or not the child understands what is happening.

Sexual abuse may involve physical contact, including penetrative and non-penetrative acts. It may also involve non-contact activity, including:

- involving children in looking at or producing sexual images;
- making children watch sexual activity;
- encouraging children to behave in sexually inappropriate ways;
- sexualised communication;
- grooming a child in preparation for abuse; or
- abuse facilitated through the internet or other technology.

Sexual abuse can occur online as well as face-to-face. It may be perpetrated by men, women or other children. Children are often sexually abused by somebody already known to them.

Possible indicators may include:

- sexual knowledge, language, play or behaviour which appears unusual for the child's age or developmental stage;
- inappropriate or harmful sexual behaviour towards others;
- significant changes in behaviour, mood or relationships;
- withdrawal, depression, anxiety or fearfulness;
- avoidance of a particular person or place;
- reluctance to go home;
- unexplained physical discomfort, soreness or injury;
- difficulty walking or sitting without an obvious explanation;
- regression, including changes in toileting or communication;
- self-harm or other significant emotional distress;
- unexplained gifts, money or possessions;
- secretive or concerning online relationships or communication;
- reluctance to change for PE or swimming; or
- a direct or indirect disclosure.

No child should be expected to provide a detailed account before a safeguarding concern is reported.

Neglect

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

Neglect may begin during pregnancy, for example through maternal substance misuse. After birth, neglect may involve a parent or carer failing to:

- provide adequate food, clothing or shelter;
- protect the child from physical or emotional harm or danger;
- provide adequate supervision or safe caregivers;
- ensure appropriate medical care or treatment; or
- respond adequately to the child's basic emotional needs.

Possible indicators may include:

- persistent hunger or seeking, stealing or hoarding food;
- poor hygiene or persistently unwashed clothing;
- inadequate or inappropriate clothing for the weather;
- untreated medical or dental needs;
- frequent tiredness or falling asleep during the school day;

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- poor growth, weight concerns or developmental delay;
- persistent lateness or unexplained absence from education;
- poor concentration or significant deterioration in educational engagement;
- inadequate supervision;
- being left alone or with inappropriate caregivers;
- regularly not being collected from school;
- responsibilities which are inappropriate for the child's age or development;
- persistent lack of stimulation or emotional responsiveness; or
- repeated concerns suggesting that the child's basic needs are not being met.

Neglect may develop gradually and the significance of individual concerns may only become apparent when information is considered cumulatively over time.

Child Criminal Exploitation and Child Sexual Exploitation

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) are forms of abuse.

They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal or sexual activity. Exploitation may involve an exchange for something the child needs or wants, increased status or financial advantage for another person, and/or violence or threats of violence.

CCE and CSE may be committed or facilitated by individuals, organised networks or gangs. Children may be moved or trafficked for the purpose of exploitation.

A child cannot consent to being exploited, abused or trafficked. A child may not recognise that they are being exploited and may believe that an exploitative relationship is genuine. Children who are criminally exploited should have their vulnerability recognised and be treated as victims.

Possible indicators may include:

- unexplained money, clothing, phones, gifts or other possessions;
- possession of multiple phones or SIM cards;
- significant changes in friendships or association with older or controlling individuals;
- unexplained journeys or travel outside the local area;
- going missing from home, school or care;
- deterioration in attendance, engagement or educational performance;
- increasing secrecy, anxiety, fear or withdrawal;
- unexplained injuries;
- involvement in crime or substance misuse;
- being found in locations unrelated to the child's usual activities;
- secretive or concerning online contact;
- threats, coercion, blackmail or debt;
- pressure to carry money, drugs, weapons or other items;
- requests to share images, personal information or live location;
- sexualised relationships or behaviour giving cause for concern; or
- significant changes in lifestyle which cannot reasonably be explained.

Concerns about exploitation must be considered in accordance with Section 17 – Exploitation, Gang Affiliation and Serious Violence.

Modern Slavery and Trafficking

Modern slavery may include human trafficking, slavery, servitude, forced or compulsory labour, sexual exploitation and forced criminality.

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Children who are trafficked or exploited may appear to cooperate with those exploiting them because of grooming, fear, threats, dependency, debt or coercion. Apparent compliance must never be taken as evidence that exploitation is voluntary.

Potential indicators may overlap substantially with CCE and CSE and can include:

- being controlled or accompanied by another person;
- fear of particular adults or groups;
- restricted freedom of movement;
- unexplained travel or changes in accommodation;
- missing episodes;
- being required to work or undertake criminal activity;
- having money, identification documents or possessions controlled by another person; or
- signs of physical, sexual or emotional abuse.

Where modern slavery or trafficking is suspected, the procedures in Section 17 apply, including consideration of a child-protection referral and the National Referral Mechanism.

Child-on-Child Abuse

Children can abuse other children inside or outside school and online. This may include bullying and discriminatory abuse, physical abuse, abuse within intimate relationships, sexual harassment, sexual violence, harmful sexual behaviour, nudes and semi-nudes, upskirting and initiation or hazing behaviour. The absence of reports does not mean that abuse is not occurring.

Harmful behaviour must not be dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”.

Child-on-child abuse is a safeguarding issue for both the child who has experienced harm and the child alleged to have caused it. Detailed procedures are set out in Section 13 – Child-on-Child Abuse, including Harassment and Violence.

Online and Extra-Familial Harm

Children may be harmed outside their family environment, including within peer groups, relationships, the local community and online.

Extra-familial harm can include:

- sexual harassment and sexual exploitation;
- criminal or financial exploitation;
- serious youth violence;
- county lines;
- radicalisation;
- teenage relationship abuse;
- bullying and discriminatory abuse; and
- online grooming, coercion or harassment.

Online and offline harm frequently overlap. Technology may be used to identify, contact, groom, threaten, control, exploit or abuse children.

Staff should consider where, when and with whom a child may be at risk, rather than focusing only on circumstances within the family home.

Additional Vulnerability and Barriers to Disclosure

Some children may face additional risks or barriers to recognising, reporting or disclosing harm.

Staff should be particularly alert where a child:

- has SEND, a disability, medical condition or communication difficulty;
- has a mental-health need;
- is a young carer;
- has or has previously had a social worker;
- is looked after or previously looked after;
- is frequently absent or missing from education, home or care;
- is experiencing disrupted education, repeated suspension or alternative provision;
- is affected by domestic abuse, parental substance misuse or parental mental ill-health;
- has a parent/carer in custody or is affected by parental offending;
- is experiencing homelessness or family instability;
- is at risk of discrimination or prejudice-based harm;
- is at risk of exploitation, trafficking, modern slavery or serious violence;
- is at risk of radicalisation;
- is at risk of honour or faith-based abuse, including FGM or forced marriage; or
- is privately fostered.

Children may not feel ready or know how to tell somebody that they are being harmed. They may not recognise their experiences as abusive or exploitative. They may feel embarrassed, ashamed, frightened or threatened, or experience communication, language or other barriers.

A lack of disclosure must never be interpreted as evidence that abuse is not occurring.

Children with SEND, disabilities or health conditions

Staff must be particularly careful not to assume that changes in behaviour, mood, presentation or injury are simply consequences of a child's SEND, disability or medical condition.

Additional concerns may include:

- injuries which are unusual given the child's mobility;
- inadequate assistance with feeding, toileting, medication or personal care;
- inappropriate or excessive restraint;
- rough handling;
- lack of appropriate stimulation;
- failure to understand or use the child's preferred means of communication;
- inappropriate equipment or unmet health needs;
- increased dependence on adults for intimate or personal care; or
- difficulty understanding, recognising or communicating abusive experiences.

Communication difficulties must increase professional curiosity, not reduce it.

Indicators relating to parents or carers

A parent's or carer's response to a concern does not in itself establish that abuse has occurred. However, staff should remain professionally curious where there are:

- unexplained delays in seeking necessary medical treatment;
- repeated or significantly inconsistent explanations for injuries or events;

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- explanations which appear inconsistent with the child's age or development;
- reluctance to provide relevant information;
- persistently negative or demeaning attitudes towards the child;
- unrealistic expectations of the child;
- significant concerns regarding substance misuse, domestic abuse or coercive control;
- attempts to prevent professionals seeing or speaking with the child; or
- repeated failure to engage with support where concerns about the child's welfare remain.

Such information should be considered alongside the whole safeguarding picture, rather than treated as proof of maltreatment in isolation.

Key Staff Message

Indicators are not a checklist and staff do not need proof before reporting a safeguarding concern. Abuse, neglect and exploitation may be hidden, may occur online or offline, may involve adults or other children and may involve several forms of harm at the same time.

If something you see, hear, notice or are told causes concern about a child:

ACT – RECORD – REPORT.

Record the concern promptly in accordance with the School's safeguarding procedures and speak to the DSL or a Deputy DSL where required.

If you are unsure whether something is a safeguarding concern, speak to the DSL or a Deputy DSL. Do not wait for proof. Do not investigate. Do not assume somebody else will act.

Appendix 2 – Responding to a Safeguarding Concern or Disclosure: Staff Quick Guide

A child may disclose abuse, neglect or exploitation directly, indirectly or through changes in behaviour or presentation. They may choose carefully whom they speak to and may find disclosure difficult.

The role of staff is to listen, reassure, record and report — not to investigate.

If a child tells you something

1. Listen

- Stay calm and give the child your full attention.
- Allow the child to speak at their own pace and in their own words.
- Listen carefully without interrupting unnecessarily.
- Take what the child says seriously.
- Do not show shock, disbelief, anger or embarrassment.
- Do not ask the child to repeat their account unnecessarily.

2. Reassure

- Reassure the child that they have done the right thing by telling you.
- Make clear that they are being taken seriously.
- Where appropriate, reassure them that what has happened is not their fault.
- Do not blame, shame or criticise the child.
- Do not make comments or judgements about the person alleged to have caused harm.

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- Never promise confidentiality. Explain that you need to share the information with people who can help keep them safe.
- Explain, in a way the child can understand, what will happen next and who you will need to tell.

A child should never be made to feel that they are creating a problem by reporting abuse, neglect, exploitation or harmful behaviour.

3. Clarify only where necessary

Staff must not investigate.

If clarification is genuinely necessary to understand what the child is telling you, use only minimal, open questions, for example:

“Tell me what happened.”

“Tell me more about that.”

“What happened next?”

“Is there anything else you want to tell me?”

Do not:

- ask leading or suggestive questions;
- repeatedly question the child;
- ask the child to prove or justify what they are saying;
- confront the person alleged to have caused harm;
- attempt to determine whether an offence has been committed; or
- conduct your own investigation.

Further assessment or investigation is the responsibility of the DSL and, where appropriate, Children’s Social Care or the Police.

4. Record

Make a safeguarding record as soon as possible, normally on CPOMS.

The record should include:

- the date, time and location;
- who was present;
- what the child said, using their own words wherever possible;
- what you saw or observed;
- any questions you asked and the child's responses;
- any immediate action taken; and
- who the concern was reported to and when.

Records must be factual and objective. Clearly distinguish between:

- what the child said;
- what you personally observed;
- information provided by somebody else; and
- any professional opinion.

Do not add speculation or attempt to interpret what the child meant.

If the concern relates to a physical injury, do not photograph the injury using a personal or school device. Record what you observed accurately and follow the safeguarding reporting procedure.

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If the child later retracts or changes their account, the original disclosure must still be recorded and reported. Do not assume that a retraction means the original concern was false.

5. Report

Safeguarding concerns must be passed to the DSL or a Deputy DSL without delay.

For routine concerns:

Record on CPOMS → ensure the concern reaches the DSL team.

For an urgent or significant safeguarding concern:

Speak directly to the DSL/DDSL immediately → then complete the CPOMS record.

Logging a concern on CPOMS is not a substitute for speaking directly to a DSL where immediate action may be required.

If the DSL/DDSL is unavailable and a child may be suffering or likely to suffer harm, any member of staff may make a direct referral to Birmingham Children's Trust/CASS.

If a child is in immediate danger, call 999.

Staff must never assume that somebody else will take action.

6. Do not contact parents yourself

Staff should not discuss a significant safeguarding disclosure with parents or carers without first consulting the DSL/DDSL.

Parents will normally be involved where it is safe and appropriate to do so. However, contacting them may sometimes:

- increase the risk to the child or another person;
- compromise evidence;
- alert a person who may have caused harm; or
- interfere with a Children's Social Care or Police response.

The DSL will determine how and when parents should be involved, seeking advice from statutory agencies where necessary.

If the concern involves an adult working with children

Do not report a concern about an adult through the normal child-concern route alone.

- Concern/allegation about a member of staff, volunteer, contractor, supply worker or trainee teacher → report immediately to the Headteacher.
- Concern/allegation about the Headteacher → report immediately to the Chair of Governors.
- Where the normal reporting route is compromised by a conflict of interest → contact the Birmingham LADO.

See Section 23 – Concerns and Allegations About Adults, Low-Level Concerns and Whistleblowing.

If the concern involves nudes or semi-nudes

Do not:

- ask the child to show you the image;

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- view it unless unavoidable;
- copy, screenshot, print, forward, save or share it;
- ask another person to view it; or
- investigate the circumstances yourself.

Report the matter immediately to the DSL/DDSL and follow Section 14 – Nudes, Semi-Nudes and Image-Based Abuse.

After reporting

Continue to respond normally and supportively to the child. Do not repeatedly question them or ask for updates about any investigation.

Safeguarding information must only be shared with people who need to know.

If you remain concerned that appropriate action has not been taken, raise the concern again, escalate it or make a direct referral where necessary.

Listening to a disclosure can also be difficult for the member of staff involved. Appropriate support is available through the DSL or Headteacher.

Remember

LISTEN – REASSURE – RECORD – REPORT

Do not investigate.

Do not promise confidentiality.

Do not delay.

Do not assume somebody else will act.

If you are unsure, speak to the DSL or a Deputy DSL.

If a child is in immediate danger, call 999.

Appendix 3 - Key Safeguarding Guidance and Useful Links

This appendix signposts the principal statutory guidance, local procedures and specialist safeguarding resources referred to throughout this policy.

Where guidance is updated after publication of this policy, the most recent version of the relevant statutory or official guidance should be followed.

Birmingham and Local Safeguarding Guidance

- Birmingham Safeguarding Children Partnership (BSCP) – local safeguarding procedures, learning and multi-agency guidance.
- Birmingham Safeguarding Children Partnership – Right Help, Right Time, Version 6, January 2025 – Birmingham’s framework for identifying levels of need and determining appropriate support and intervention. [Right Help, Right Time](#)
- Birmingham Safeguarding Children Partnership – Resolution and Escalation Protocol – for resolving professional disagreement where safeguarding needs are not being adequately addressed. [Resolution and Escalation Protocol](#)
- Birmingham City Council – Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance 2018. [Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance](#)

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- Birmingham City Council – Children Missing Education procedures and referral arrangements. [Birmingham Children Missing Education Service](#)
- Birmingham Children’s Trust – Children’s Advice and Support Service (CASS).
- Birmingham Local Authority Designated Officer (LADO) – procedures for allegations concerning adults working with children.
- West Midlands Safeguarding Children Procedures – regional multi-agency safeguarding procedures.

Core National Statutory Guidance

- Department for Education – Keeping Children Safe in Education 2026, effective 1 September 2026. This is the principal statutory safeguarding guidance for schools and colleges. [Keeping Children Safe in Education 2026](#)
- Department for Education – Working Together to Safeguard Children 2026, updated 18 March 2026. [Working Together to Safeguard Children 2026](#)
- Department for Education – Information Sharing to Safeguard Children and Young People: Statutory Guidance, September 2026, reflecting the information-sharing duty under section 16LA of the Children Act 2004 from 30 September 2026. [Information Sharing statutory guidance](#)
- Department for Education – Early Years Foundation Stage Statutory Framework for Group and School-Based Providers, effective 1 September 2026. [EYFS statutory framework](#)
- Prevent Duty Guidance: England and Wales 2023, last updated March 2024. [Prevent Duty Guidance](#)
- Channel Duty Guidance – current statutory multi-agency guidance relating to Channel.
- Multi-agency Statutory Guidance on Female Genital Mutilation, 2020.
- The Right to Choose: Government Guidance on Forced Marriage.
- Domestic Abuse Act 2021 and associated statutory guidance.

Attendance and Children Missing Education

- Department for Education – Working Together to Improve School Attendance, statutory guidance, updated 9 July 2026. [Working Together to Improve School Attendance](#)
- Department for Education – Children Missing Education: Statutory Guidance for Local Authorities and Schools, updated 8 September 2025. [Children Missing Education statutory guidance](#)
- School Attendance (Pupil Registration) (England) Regulations 2024.

Online Safety, Filtering, AI and Mobile Technology

- Department for Education – Filtering and Monitoring: Core Standard, updated 8 September 2026. [Filtering and Monitoring Core Standard](#)
- Department for Education – Generative Artificial Intelligence in Education.
- Department for Education – Generative AI Product Safety Standards.
- Department for Education – Data Protection in Schools, including guidance relating to generative AI.
- Department for Education – Cyber Security Core Standard for Schools and Colleges.
- Department for Education – Mobile Phones in Schools, statutory guidance from 29 June 2026, to be followed by schools from 1 September 2026. [Mobile Phones in Schools](#)

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- UK Council for Internet Safety – Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People, updated March 2024. [UKCIS Sharing Nudes and Semi-Nudes guidance](#)

Exploitation, Modern Slavery and Serious Violence

- Home Office – Criminal Exploitation of Children and Vulnerable Adults: County Lines, updated 20 October 2023. [County Lines guidance](#)
- Home Office – Modern Slavery: Statutory Guidance for England and Wales, including the National Referral Mechanism.
- Home Office – Serious Violence Duty: Preventing and Reducing Serious Violence, Statutory Guidance, December 2022.
- Youth Endowment Fund – Violence Prevention Toolkit – current evidence and guidance concerning prevention of serious violence.

Mental Health and Wellbeing

- Department for Education – Mental Health and Behaviour in Schools, 2018.
- Department for Education – Promoting and Supporting Mental Health and Wellbeing in Schools and Colleges.
- NHS 111 – urgent mental-health support.
- Forward Thinking Birmingham – specialist children and young people's mental-health provision.
- Birmingham City Council – Suicide Postvention Support for Education Settings.

Restrictive Intervention and Physical Safety

- Department for Education – Restrictive Interventions, including the Use of Reasonable Force, in Schools, effective from 1 April 2026. [Restrictive Interventions and Reasonable Force guidance](#)
- Department for Education – Supporting Pupils at School with Medical Conditions.
- Current national guidance relating to allergy safety and anaphylaxis in schools.

Alternative Provision and External Providers

- Department for Education – Alternative Provision: Statutory Guidance, updated 5 February 2025. [Alternative Provision statutory guidance](#)
- Department for Education – Non-School Alternative Provision: Voluntary National Standards, 2025.
- Department for Education – Safeguarding Guidance for After-School Clubs, Community Activities and Tuition, updated 2026.

Safer Recruitment and Concerns About Adults

Staff responsible for recruitment, suitability checks, allegations or referrals should refer to:

- Keeping Children Safe in Education 2026 – Part Three: Safer Recruitment
- Keeping Children Safe in Education 2026 – Part Four: Safeguarding Concerns or Allegations Made About Staff

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- Disclosure and Barring Service – Barring Referral Guidance
- Teaching Regulation Agency – Teacher Misconduct Guidance
- Childcare (Disqualification) and Childcare Act 2006 requirements
- current Birmingham LADO / Position of Trust procedures.

Related Priory School Policies and Procedures

This Safeguarding and Child Protection Policy should be read alongside the School's current:

- Staff Code of Conduct
- Behaviour Policy
- Anti-Bullying Policy
- Whistleblowing Policy
- Safer Recruitment procedures
- Online Safety / Acceptable Use arrangements
- Data Protection Policy and Records Retention arrangements
- SEND Policy
- Attendance procedures
- Health and Safety Policy
- First Aid and Medical Conditions procedures
- Intimate Care procedures
- Educational Visits procedures
- Risk Assessment procedures
- EYFS procedures, including mobile phone/camera arrangements where applicable.

This policy is informed by legislation, statutory guidance and local safeguarding procedures current at the date of publication. Safeguarding guidance changes over time. Where any guidance referenced in this appendix is subsequently amended or replaced, Priory School will follow the current statutory requirement or official guidance and will update this policy where necessary.

Appendix 4 – Guidance for Adults Visiting or Working Temporarily at Priory School

Important information



As part of our Safeguarding Policy, it is prohibited to use cameras and mobile phones in any spaces accessible by pupils.



It is against the law to smoke or vape on these premises.



If the fire alarm sounds, leave the building by the nearest exit and proceed to the designated assembly point. Do not re-enter the building until you are told it is safe.



The main assembly point is the school field



The school accepts no responsibility for any loss or damage to visitors' property or vehicles.



Safeguarding/child protection



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Designated Safeguarding Lead

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PRIORY SCHOOL
EDGBASTON

Safeguarding Children and Health and safety

Guidance for adults
visiting or working
temporarily at Priory School

(September 2026)

SAFEGUARDING POLICY

Our Safeguarding Commitment

Priory School welcomes visitors for a wide variety of purposes, from parent helpers to temporary contractors supporting the maintenance of the school site.

Priory School is fully committed to safeguarding the children in our care and recognises that everyone has a part to play in keeping children safe. Staff, volunteers, visitors, contractors and subcontractors can all help by remaining vigilant and reporting any concerns.

Priory School has a zero-tolerance approach to sexual harassment, victim blaming, sexual violence, and inappropriate language relating to these matters. Any such behaviour must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.

It is also important that everyone understands how to keep themselves safe and guard against false allegations. Actions or comments can sometimes be perceived in ways that were not intended. Priory School promotes safe working practices for all, and the following guidance is intended to help reduce the risk of misunderstandings or allegations.

DO NOTS...

-  **Do not initiate verbal or physical contact with pupils**, either on or off site, unless it is appropriate and forms part of the agreed purpose of your visit.
-  **If a pupil initiates verbal or physical contact with you, respond appropriately and professionally**, then report the interaction to a member of Priory School staff, preferably the person responsible for your visit.
-  **Do not share personal information with pupils**, including your home address, telephone number, personal email address, or social media contact details.
-  **Do not accept personal information from pupils**, or engage in any communication outside the appropriate professional context.
-  **Do not communicate with pupils through social media platforms** or personal messaging services.
-  **Do not ignore rude, disrespectful, discriminatory or prejudiced behaviour**. If you witness such behaviour, report it immediately to a member of Priory School staff rather than dealing with it yourself.

THE DOS...

-  Do be aware that verbal interactions with pupils can be interpreted by them as being offensive or inappropriate, even if this was not your intention.
-  Do report any unacceptable behaviour from a pupil or another adult.



Do enjoy your visit and play a positive part in making Priory School a safe, friendly and welcoming environment enabling children to flourish.

Visitors to the EYFS (Poppets)

If you are visiting the EYFS you are required to switch off leave your mobile phone in your bag or pocket before entering the Poppets section.

Child Protection

All those working around children must be aware of the risk of abuse by adults or other children. We believe that all pupils have the right to be safeguarded from harm, radicalisation and exploitation regardless of:

- Race, religion, preferred language or ethnicity.
- Age, gender, sexuality or disability.

If you have any concerns for a child's safety or wellbeing during the course of your visit it is imperative that you:

- Immediately inform a DSL or Deputy DSL, listed at the back of this leaflet
- Provide careful notes detailing the nature of your concern including what you have heard, witnessed or been told. Include the date, time and your signature.

You have a duty to report any safeguarding concerns if you suspect abuse. This includes situations where a child discloses abuse to you, or where you believe a child maybe at risk.

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