The Buckinghamshire Primary Pupil Referral Unit

Perseverance Respect Understanding

SAFEGUARDING POLICY AND PROCEDURES

Autumn 2026

(Update following KCSiE September 2026)

This policy is due to be considered by the Management Committee: Autumn 2026

Next Review: Autumn 2027

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1. **Contacts Please note that contacts have been updated**

PRU contacts

PRU Contacts	DSL/ADSL	ADSL	Telephone
Pathways	**Jay Hawes** PRU DSL/Teacher in Charge Designated teacher for looked after children Prevent Lead jhawes@primarypru.bucks.sch.uk	**Sarah McGowan** Senior Teacher (ADSL) smcgowan@primarypru.bucks.sch.uk **Kathryn Mason** Senior Teacher (ADSL) kmason@primarypru.bucks.sch.uk **Sam Haig** Head teacher/ADSL shaig@primarypru.bucks.sch.uk	01296 387300
Woodlands	**Tess Syed** Teacher in Charge (ADSL) tsyed@primarypru.bucks.sch.uk	**Jaime Loftus** Senior Teacher (ADSL) jloftus@primarypru.bucks.sch.uk	01494 475350
The Oaks	**Izzy Macmillan** Teacher in Charge (ADSL) imacmillan@primarypru.bucks.sch.uk	**Stuart Chandler** Senior Teacher (ADSL) schandler@primarypru.bucks.sch.uk	01494 586845

Nominated member of the Management Committee for safeguarding: Louise Sim

Contact: via Head teacher or PRU Operations Manager

Chair of the Management Committee: Julie Lawrence

Contact: via Head teacher or PRU Operations Manager

PRU Operations Manager: Zoe Payne

Telephone: 01296 387300

Email: zpayne@primarypru.bucks.sch.uk

Contacts in The Local Authority

Education Safeguarding Advisory Service ESAS offers support to education providers to assist them to deliver effectively on all aspects of their safeguarding responsibilities.	01296 387981 Secure-esasduty@buckinghamshire.gov.uk
First Response Team (aka MASH) (including Family Help and Channel) The First Response Team process all new referrals to social care, including children with disabilities. Referrals are assessed by the team to check the seriousness and urgency of the concerns and whether Section 17 and/or Section 47 of the Children Act 1989 apply. The First Response Team will ensure that the referral reaches the appropriate team for assistance in a quick and efficient manner.	01296 383962 Out of hours 0800 999 7677 Secure-cypfirstresponse@buckinghamshire.gov.uk
Local Authority Designated Officer (LADO) The Buckinghamshire Local Authority Designated Officer (LADO) is responsible for overseeing the management of all allegations against people in a position of trust who work with children in Buckinghamshire on either a paid or voluntary basis	01296 382070 Secure-lado@buckinghamshire.gov.uk
Bucks Family Information Service Information for families on a range of issues including childcare, finances, parenting and education	01296 383293
Buckinghamshire Safeguarding Children Partnership (BSCP) Procedures, policies and practice guidelines	

Schools Web School bulletin, Safeguarding links, A-Z guide to information and services	
Thames Valley Police	101 (999 in case of emergency)

This policy should be read in conjunction with the following policies and other policies you feel it would be useful to refer to:

- Anti-bullying
- Attendance
- Behaviour and Use of Reasonable Force
- Children Looked After
- Complaints
- Equalities
- GDPR (including record keeping)
- SEN/Inclusion
- Health & Safety (including managing children with medical needs)
- E-Safety (including use of mobile/electronic devices and photos)
- Staff Code of Conduct
- PSHE - to include RE & RSE
- Whistleblowing
- Safer Recruitment

Definitions

Safeguarding and promoting the welfare of children is defined for the purpose of this policy as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is in or outside the family 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
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with outcomes set out in the Children's Social Care National Framework.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.' (Working Together to Safeguard Children 2026)

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Further information regarding the categories of abuse can be found in the appendix to this document.

Children includes everyone under the age of 18.

2. Introduction

This policy has been developed in accordance with following legislation and guidance:

- Children Act 1989 (amended 2004)
- "Working Together to Safeguard Children" Working together to safeguard children - GOV.UK (www.gov.uk)
- Keeping Children Safe in Education 2026"- statutory guidance for schools and further education colleges - Keeping children safe in education (publishing.service.gov.uk) Keeping children safe in education 2026: September 2026
- Information Sharing Guidance for Safeguarding Practitioners Information sharing advice for safeguarding practitioners - GOV.UK
- Children Missing Education; Statutory Guidance for Local Authorities - Sept 2016 Children missing education - GOV.UK
- Statutory Guidance issued under section 29 of the Counter-Terrorism and Security Act - 2015 Prevent Duty Guidance
- The Equality Act - 2010 Equality Act 2010: guidance - GOV.UK
- What to do if you're worried a child is being abused - March 2015 What to do if you are worried a child is being abused
- Statutory guidance on FGM Multi-agency Statutory Guidance on Female Genital Mutilation

Clear governance and leadership is central to embedding a safeguarding culture. The Management Committee takes its responsibility seriously under **section 175 of the Education Act 2002** to safeguard and promote the welfare of children; working together with other agencies to ensure effective and robust arrangements are in place within our school to identify and support those children who are suffering harm or whom may be at risk of harm.

Section 175 of the Education Act 2002, places a duty on schools and local authorities to safeguard and promote the welfare of pupils

The Management Committee will ensure that all staff, including staff who do not work directly with pupils, read and understand Part One of Keeping Children Safe in Education 2026 in full. The PRU also requires staff to read Part Five because of the relevance of child-on-child sexual harassment, sexual violence and harmful sexual behaviour to its work. Annex A now contains further safeguarding information and Annex B sets out the role of the DSL.

All staff are required to read and adhere to the **Staff Code of Conduct**.

Every member of the PRU community is responsible for contributing to a positive culture of safeguarding.

The PRU recognises that as well as risks to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their homes, including online and from other children. Staff must remain vigilant and alert to these potential risks.

The aims of this policy are:

To provide an environment in which children feel safe, secure, valued and respected.

To ensure that senior leaders, teaching staff and non-teaching staff, supply staff, members of the Management Committee and volunteers:

- Are aware of the need to safeguard and promote the wellbeing of children
- Identify the need for early support
- Promptly report concerns, in line with guidance from the Buckinghamshire Continuum of Need
- Are trained to recognise signs and indicators of abuse

To provide systematic means of monitoring children known to be or thought to be at risk of harm and ensure contribution to assessments of need and support plans for those children.

To ensure the PRU has a clear system for communicating concerns both internally and with external agencies in line with the Working Together guidance.

To ensure the PRU has robust systems in place to accurately record safeguarding and child protection concerns.

To develop effective working relationships with all other agencies involved in safeguarding, supporting the needs of children at our school.

To ensure that all staff appointed have been through the safer recruitment process and understand the principles of safer working practices as set out in our **Staff Code of Conduct**.

To ensure that all staff understand the processes in place to manage an allegation against a staff member, member of the Management Committee or volunteer.

To ensure that any community users of our facilities have due regard to expectations of how they should maintain a safe environment, which supports children's wellbeing (note: The PRU does not offer its facilities for community use at present).

This policy is published on our website, (www.bucksprimarypru.bucks.co.uk) and hard copies are available from the PRU offices.

3. Responsibilities

All **staff, supply staff, volunteers, visitors, members of the Management Committee and contractors** understand that safeguarding children is everyone's responsibility. Any person who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred must report it immediately to a member of the PRU DSL team at the relevant site. Names and contact details are shown in section 1 and displayed in the reception areas of each site. In their absence, the concern must be reported to any of the named DSL team and to the most senior person on site. PRU staff must record incidents on the internal record system, CPOMS, which will send an email to the DSL to alert them to a concern. Paper versions of records of concern are available on each site for completion by visitors and volunteers, or if systems access to CPOMs is not available.

Staff must maintain a good working knowledge of the Buckinghamshire Continuum of Need The Continuum of Need - Buckinghamshire Safeguarding Children Partnership (buckssafeguarding.org.uk) and any updates and how it should be used to inform decision making regarding a referral to First Response.

Family Help and statutory intervention

All staff must understand Buckinghamshire's arrangements for universal services and community-based early help, the targeted early help level of Family Help, and statutory services under section 17 of the Children Act 1989. Staff must also understand when concerns may require assessment under section 47, or relate to sections 20 or 31 of the Children Act

1989. Concerns must be discussed promptly with the DSL or an ADSL and must not be delayed while staff attempt to determine the final threshold themselves.

The DSL will normally lead liaison with other agencies and referrals through the Buckinghamshire MASH or other current local route. Where a child's circumstances do not improve, deteriorate, or the response does not adequately address identified risk, the DSL will reconsider the level of need and escalate in accordance with Buckinghamshire Safeguarding Children Partnership procedures.

Professional curiosity and respectful challenge

All staff and volunteers must remain professionally curious, seek to understand the child's lived experience, explore inconsistencies and avoid accepting explanations at face value where safeguarding concerns may exist. Staff must consider alternative explanations, communication barriers, disguised compliance and the possibility that more than one form of harm may be present. Where professionals disagree or a child is not receiving an appropriate response, the PRU will use respectful challenge and the relevant multi-agency escalation or dispute-resolution procedure.

Staff must have the skills, knowledge and understanding to keep both looked after children and previously looked after children safe.

Staff must understand vulnerability and that barriers exist when recognising abuse. Consider the following groups who may have increased vulnerability:

- Young carers
- Children with SEND
- Children living with domestic abuse
- Children who experiencing poor mental health
- Children whose parents suffer with poor mental health, including substance misuse
- Criminal exploitation, including sexual exploitation, County Lines radicalisation and gang involvement
- Look after children and previously look after children
- Children who have a social worker
- Privately fostered children
- Asylum seekers
- So-called Honour Based Violence, including FGM and forced marriage
- Children who frequently go missing or whose attendance is a concern
- Children who are part of the LGBTQ+ group
- Children who are at risk of discrimination due to faith and belief, race or ethnicity
- Children who have English as an additional language (EAL)
- Children who are living in temporary accommodation.

The Management Committee understands and fulfils its safeguarding responsibilities.

It must:

Ensure that the Head teacher and the entire DSL team creates and maintains a strong, positive culture of safeguarding within the PRU.

Ensure that this policy reflects the unique features of the community we serve and the needs of the pupils attending our provision. This policy will be reviewed at least annually and whenever new guidance is issued.

Regularly monitor and evaluate the effectiveness of this Safeguarding Policy through discussions with the DSL team and termly safeguarding meetings.

Appoint a Designated Safeguarding Lead (DSL), who is a member of the Senior Leadership Team (SLT) and has the required level of authority and also appoint at least one Deputy DSL. The roles and responsibilities of the DSL and Deputy DSL are made explicit in those post-holders' responsibilities document. If not the DSL, the Headteacher still maintains overall responsibility for safeguarding and child protection within the PRU.

Recognise the importance of the role of the DSL, ensuring they have sufficient time, training, skills and resources to be effective. Refresher training must be attended every 2 years, in addition knowledge and skills must be refreshed at regular intervals, at least annually.

Ensure that all staff complete safeguarding training to include their roles and responsibilities with regards to the PRU IT system's online filtering and monitoring.

Ensure measures are in place for the Management Committee to have oversight of how the PRU's delivery against its safeguarding responsibilities are exercised and evidenced, to include reviewing online filtering and monitoring on a regular basis and at least annually. Ensure robust structures are in place to challenge the Head teacher where there are any identified gaps in practice or procedures are not followed.

The effectiveness of filtering and monitoring will be reviewed at least once every academic year by the responsible member of SLT, with support from the DSL and IT provider. The review will include checks that filtering operates appropriately on all internet-connected devices and in all relevant locations, and a record of checks, findings, decisions and resulting actions will be retained.

Recognise the vital contribution that the PRU can make in helping children to keep safe, through incorporation of safeguarding within the curriculum. This will also be taught through the PSHE curriculum and relevant issues through the Relationship Education (primary schools) or Relationship Sex Education (secondary schools, mandatory from Sept. 2020). Ensure that through curriculum content and delivery children understand how to keep themselves safe.

Ensure that the PRU is following the statutory RSE guidance –Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk)

Ensure safe and effective recruitment policies and disciplinary procedures are in place.

Ensure resources are allocated to meet the needs of pupils requiring Child Protection or early intervention.

Ensure the DSL completes an Annual Safeguarding Report for Governors and a copy is shared with the Education Safeguarding Advisory Service at Buckinghamshire Council.

It is the duty of the Chair of Member of the Management Committee (Julie Lawrence) to liaise with relevant agencies if any allegations are made against the Headteacher. If there are

concerns that issues are not being progressed in an expedient manner, staff/pupils/parents/carers should escalate concerns to the Local Authority Designated Officer (LADO) via First Response.

The Management Committee must ensure that procedures are in place to manage, record and escalate as appropriate safeguarding concerns of allegations against staff, supply staff, members of the Management Committee, volunteers, visitors or contractors where they could pose a risk of harm to children. This must include those concerns that do not meet threshold (low-level concerns).The guidance in Part four of Keeping children safe in education (publishing.service.gov.uk) must be followed if there were any such concerns.

The Management Committee must ensure that a named teacher is designated for Looked After Children and that an up to date list of children who are subject to a Care Order or are accommodated by the Local Authority is regularly reviewed and updated. The PRU must work with the Virtual Schools Team to support the educational attainment for those children who are Looked After.

The Management Committee must have assurance that any alternative provision attended by children on roll has appropriate safeguarding arrangements and child protection policies in place. The Management Committee must ensure that any children, at such a provision, are visited whilst they are attending, that the curriculum is appropriate to the needs of the child and that attendance is monitored daily.

Any outside agencies providing services or activities to the PRU have provided assurances that they have safeguarding policies and procedures in place.

The Management Committee has a statutory duty to appoint a Nominated Member of the Management Committee for safeguarding. The Nominated Member of the Management Committee must be familiar with Buckinghamshire Safeguarding Children Partnership procedures, Local Authority procedures and guidance issued by the Department for Education. The Nominated Member of the Management Committee must:

- Work with the DSL and PRU Operations Manager to produce the Child Protection/Safeguarding Policy annually.
- Undertake appropriate safeguarding training, to include Prevent and Safer Recruitment training.
- Ensure child protection is regularly discussed at Management Committee meetings
- Meet at least termly with the DSL to review and monitor the PRU's delivery on its safeguarding responsibilities, to review the Single Central Record and complete an audit of the staff files
- Ensure that filtering and monitoring systems are in place and take part in the review
- Take responsibility to ensure that the PRU is meeting the OFSTED requirements as set out in the inspection guidance:

Education inspection framework (EIF) - GOV.UK (www.gov.uk)

All members of the Management Committees must complete safeguarding training on appointment, to also include Prevent training. This training must be regularly updated in line with national or local guidance. The Management Committee must ensure that relevant staff have due regard to the relevant data protection principles set out in the Data Protection Act 2018 and the GDPR, which allow them to share or withhold personal information when it is necessary to safeguard any child.

We have a **Designated Safeguarding Lead (DSL), supported by a team of ADSLs,** who is responsible for:

Creating a culture of safeguarding within the PRU where children are protected from harm.

Ensuring all staff receive an effective induction and ongoing training to support them to recognise and report any concerns.

Ensuring children receive the right help at the right time using the Buckinghamshire Continuum of Need document.

Ensuring referrals to partner agencies, are followed up in writing, including referrals to the Buckinghamshire MASH and Family Help services.

Establishing and maintaining a safe and secure system for recording safeguarding and child protection records. These records must be audited regularly to ensure all actions are completed.

Ensuring all child protection files are held separately from pupils' educational records.

Maintaining the record for staff safeguarding training.

Ensuring that the safeguarding team contact details and photos are displayed in prominent areas around the PRU and also on the website.

Being the designated point of contact for staff to be able to discuss and share their concerns.

Ensuring the online filtering and monitoring system is reviewed regularly, at least annually.

Being available to staff and outside agencies during school hours and term time for consultation on safeguarding concerns raised.

The Headteacher and DSL will maintain robust and well-known cover arrangements for illness, leave or other periods when the DSL is unavailable. Staff will always have a reliable confidential route through which concerns can be received, monitored and acted upon without delay. The DSL will ensure that any handover identifies urgent concerns, planned meetings, referrals and actions requiring follow-up.

Having responsibility to ensure that cover is arranged outside of term-time during working hours, with the expectation that all meetings in school holidays are attended including those convened at short notice.

During residential and extended school hours, ensuring arrangements are in place for staff to have a point of contact.

Contributing effectively to multiagency working, for the safeguarding and promotion of the welfare of children, as set out in Working Together.

Providing the Head teacher (if the Head teacher is not the DSL), with an annual report for the Management Committee, detailing how school delivers on its safeguarding responsibilities and any child protection issues within the PRU. The Management Committee will use this report to fulfil its responsibility to provide the Local Authority with information about their safeguarding policies and procedures.

Meeting at least once a term with the Nominated Member of the Management Committee to share oversight of the safeguarding provision within the setting, monitor performance and develop plans to rectify any gaps in policy or procedure. A record will be kept of these meetings. Providing the Headteacher (if DSL is not Headteacher) with up to date information of any issues.

Meeting the statutory requirement to keep up to date with knowledge, enabling them to fulfil their role, including attending mandatory and any other additional relevant training.

Referring immediately to the Police, using the guidance, When to call the police NPCC Guidance for any cases where a criminal offence may have been committed or risk of harm is imminent.

Completing DSL refresher training every 2 years and updating their skills and knowledge on a regular basis and at least annually, through means such as training, reading bulletins or attending DSL forums.

To fulfil the DSL responsibilities as set out in the KCSIE, Annex B.

The PRU's **Head teacher** and **PRU Operations Manager** are responsible for:

Ensuring that this policy is updated annually or before to reflect any changes to guidance and/or legislation.

Ensuring that this policy is published on the PRU website.

The PRU's **Head teacher i**s also responsible for:

Recording, reviewing and making decisions on any low-level concerns, with members of SLT and/or others in the DSL team as appropriate.

Liaising with the LADO in the event of an allegation being made against a member of the staff, volunteer or an organisation using the PRU premises.

Liaising with the DSL team to ensure they have appropriate time, funding, training and resources to fulfil their role.

Ensuring that appropriate cover is in place to attend strategy meetings or CP conferences that take place during the school holidays or in the event that the DSL is absent.

Ensuring that a designated 'Appropriate Adult' is in place in order to support children in line with the Police and Criminal Evidence (PACE) act, PACE Code C 2023 (accessible) - GOV.UK (www.gov.uk) which advises that "The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons", with there being further elaboration that the AA is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained persons rights and entitlements, as well as helping the detained person understand their rights. This can also be found as part the PRU's Searching and Screening Policy.

4. Procedures

The procedures for all staff, supply staff, members of the Management Committee, volunteers, visitors and contractors in safeguarding and protecting children from harm are in line with Buckinghamshire Council and Buckinghamshire Safeguarding Children Partnership safeguarding procedures, **"Working Together to Safeguard Children"** Working together to safeguard children - GOV.UK (www.gov.uk),

"Keeping Children Safe in Education" Keeping children safe in education (publishing.service.gov.uk) and statutory guidance issued under section 29 of the **Counter-Terrorism and Security Act 2015** Revised Prevent duty guidance: for England and Wales - GOV.UK (www.gov.uk).

The PRU is unique as we work with pupils from mainstream settings across Buckinghamshire, and, as a result, our pupils come from a range of communities and we acknowledge the diversity in cultures and backgrounds. We aim to have strong working relationships with parents/carers and mainstream colleagues so that we are well informed and equipped to deal

with such diversity as we recognise that this is in the best interests of our pupils; whilst ensuring that safeguarding takes precedence when there are any child protection concerns.

We will ensure:

Visitors are:

- Clearly identified with visitor/contractor passes.
- Met and directed by PRU staff/representatives.
- Signed in and out of the premises by PRU staff.
- Directed to a poster with details of all of the DSL team at the PRU and the reverse of their visitor badge informing them of how to report a concern.
- Given restricted access to only specific areas of the PRU, as appropriate.
- Escorted by a member of staff/representative as required.
- Given access to pupils restricted to the purpose of their visit, with a member of staff to accompany them as required.

All members of staff must complete safeguarding training every 3 years, attend annual refresher training and partake in any training opportunities arranged or delivered by the DSL. Updates must be cascaded to all staff throughout, the year. All new staff will receive safeguarding and child protection training on induction to include online safety and the PRU's filtering and monitoring system.

All staff will read the safeguarding policy, Part 1 of the KCSIE in full. Safeguarding induction will include the child protection policy, staff code of conduct, behaviour policy, low-level concerns and allegations procedures, online safety and filtering and monitoring responsibilities, the safeguarding response to repeated or prolonged absence, and the identity and role of the DSL and ADSLs. Safeguarding and online-safety updates will be provided as required and at least annually, will sign a declaration to show that the guidance has been reviewed and they have a clear understanding of their role. There are audit methods in place to ensure that staff have understood the content.

All parents/carers must be made aware of the PRU's responsibilities in regard to child protection procedures through this policy, the PRU's website, in-reach placement documents and through discussion with PRU staff.

All staff, including supply staff, must follow the reporting procedures as follows when reporting any child protection concerns:

- Staff must ensure the child is in a safe place and in receipt of support
- Staff must initially make a verbal report to the DSL to alert them to the safeguarding/child protection concern
- Staff must make a written report using the PRU's electronic record keeping process (CPOMs)
- All concern forms are located within CPOMs. All staff receive training on how to record and report concerns. Concerns are flagged for the attention of the DSL and relevant ADSL for the site. In the event that the CPOMs system is unavailable, then paper versions of the Record of Concern reports are available close to safeguarding notice boards on each site and also in reception areas.
- Staff must ensure the time and date of the incident is recorded
- A factual account of the incident must be recorded, including who was involved, what was said/seen/heard, where the incident took place and any actual words or phrases used by the child
- Use a body map to record any injuries seen or reported by the child
- Staff must sign and date the report giving details of their role within PRU
- The DSL/ADSL must record when the report was passed to them and what action was taken alongside any outcomes achieve.

- The DSL must ensure the child's wishes and feelings are taken into consideration when deciding on next steps.

Through our **Attendance Policy**, we have a robust system for monitoring attendance which is in line with the latest national attendance guidance, and will act to address absenteeism (including unexplainable and/or persistent absence) with parents/carers and pupils promptly and identify any safeguarding issues arising. We involve the local authority attendance team at appropriate stages.

Parents are expected to contact the PRU on the first day of an absence and to keep in regular contact with the PRU until their child returns. This is explained to parents and carers as part of the in-reach documentation, which is discussed with parents/carers when their child starts a placement at the PRU. Pupil absences are reported to a member of SLT (or a senior teacher) on the first day of absence and will be discussed by classroom staff. The PRU will initiate contact if parents/carers fail to communicate about an absence and will also liaise with mainstream schools if a child is dual registered or other professionals involved in the care of the pupil and will continue to liaise as appropriate with all named contacts. The PRU will also arrange home visits and welfare checks after consultation with other professionals involved in supporting the pupil. This includes, but is not limited to, the attendance team, education entitlement team, Gypsy Romany & Traveller team and social services.

Attendance is a safeguarding indicator as well as an educational measure. Leaders will review repeated, prolonged or unexplained absence, persistent absence below 90%, severe absence below 50%, reduced timetables and failure to return after an agreed period alongside CPOMS and other welfare information. Where absence suggests abuse, neglect, exploitation or another risk of harm, safeguarding action and referral will not be delayed by attendance procedures.

Where a parent indicates an intention to electively home educate, the PRU and the school holding the statutory roll will follow the current registration and local-authority notification requirements. Where appropriate and proportionate, the decision will be discussed before arrangements are finalised, particularly where the child has SEND, a social worker or another known vulnerability. Relevant safeguarding information will be shared with the responsible school and local authority.

All children attending the PRU are required to have a minimum of two identified emergency contacts. Any pupil whose absence is causing concern and where it has not been possible to make contact with a parent/carer, will be reported as a Child Missing in Education (CME) using the **Buckinghamshire CME Protocol**. Any absence, of a pupil who is currently subject to a child protection or child in need plan is immediately referred to their social worker.

The PRU has a mandatory duty to inform the local authority, via the First Response Team, if they become aware that a child under the age of 16 years is living with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.

All staff, parents/carers and children are made aware of the school's complaints and escalation processes through this policy and other relevant policies, together with targeted discussions to meet individual pupil circumstances and updates about safeguarding, which can be activated in the event of concerns not being resolved at the first point of contact.

Our lettings policy reflects the ongoing responsibility the PRU has for safeguarding those using the site outside of normal school hours, ensuring the suitability of adults working with children on school sites at any time. School must have sight of the up to date **Child Protection Policy** of any organisation hiring the school's facilities (*Note: the PRU does not currently let its premises*).

The PRU operates **Safer Recruitment** practices. The Management Committee ensure that staff who are involved in the recruitment process have received safer recruitment training. Robust procedures are in place in order to prevent and deter people who are unsuitable to work with children, from applying or being employed by the PRU.

Allegations against members of staff, supply staff, governors, including volunteers and contractors are referred to the Local Authority Designated Officer (LADO).

Our procedures are reviewed and updated annually as a minimum, or as there are changes to legislation.

Children are encouraged to share any concerns or worries with staff through our curriculum and through ongoing dialogue as part of our day to day routines and support for pupils.

5. Record-Keeping and Retention of Records

When a disclosure of abuse or an allegation against a member of staff or volunteer has been made, no matter how low level, there must be a record of this. These records are maintained in a way that is confidential and secure, in accordance with our **GDPR policy** and **Data Protection Legislation.**

Records should include:

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

There is a statutory requirement for the PRU to pass any child protection records to the pupil's next school. This must take place within 5 days of the 1st day of term or within 5 days of an in-year transfer. There must be an auditable system in place to evidence this has taken place. Safeguarding records will be sent separately from the general files using a secure method. No records should be maintained within the PRU once the files have been transferred.

The last statutory school maintains child protection files until a pupil reaches the age of 25 years, therefore if the transfer school is unknown, or a pupil is going to be electively home educated, any child protection files will remain at the PRU in a secure location. Child protection files will only be destroyed when the pupil reaches their 25th birthday.

We have a robust system for reviewing our archived information held. Our files are stored and disposed of in line with GDPR protocols, local and national retention policies.

Recording and transfer of safeguarding information

Safeguarding records must be clear, factual and distinguish between observed information, the child's or another person's account, professional opinion and historic information. Records must include the rationale for decisions, including decisions to make or not make a referral.

At every transition point, including in-year moves and movement between the PRU and a mainstream school, safeguarding information will be transferred, reviewed and acted upon promptly. The child protection file will be transferred separately and securely, with confirmation of receipt.

References in this policy to data protection legislation include the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Data protection law does not prevent proportionate information sharing for safeguarding purposes.

We record low level concerns regarding staff, members of the Management Committee and volunteers and review them regularly to look for patterns, escalation or increase in frequency of concerns and take appropriate action as required.

6. Alternative Provision

When a child is accessing an alternative provision, the PRU remains responsible for the safeguarding of that child.

Before and throughout any placement commissioned from another alternative provision, the PRU will obtain assurance about registration status, staff suitability checks, safeguarding and child protection arrangements, staff training, attendance reporting, health and safety, quality of education and arrangements for reporting concerns. Relevant safeguarding information will be shared securely before the placement begins or without delay where risk emerges later.

The PRU will maintain active oversight through agreed attendance information, welfare checks, safeguarding communication and placement reviews. Absence, changes to location or timetable, concerns about exploitation, mental health, behaviour or welfare, and any failure to meet agreed safeguarding requirements will be followed up promptly. Commissioning a placement does not transfer the Management Committee's or Headteacher's responsibility for the pupil's safety, welfare and education.

In rare circumstances where a pupil is on a reduced timetable, contact will be made with parents on a regular basis and the welfare of the child is monitored. Reduced timetables are unusual at the PRU and any such arrangement would be bespoke, and include a strategy for review and contact. Other relevant professionals will also be involved as appropriate. Home visits would be undertaken as needed.

Alternative Provision DFE statutory guidance Alternative provision - GOV.UK and Education for children with health needs who cannot attend school - GOV.UK (www.gov.uk) – DFE statutory guidance.Education for children with health needs who cannot attend school

7. Confidentiality

We recognise that all matters relating to child protection are confidential. The Head teacher or Designated Safeguarding Lead must only disclose personal information about a pupil to other members of staff on a need to know basis. Staff must not keep duplicate or personal records of child protection concerns. All information must be reported to the Designated Safeguarding Lead and securely stored in the designated location within the PRU, separate from the pupil records.

All staff are aware they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another as they have a duty to share. Staff must, however, reassure the child that information will only be shared with those people who will be able to help them and therefore need to know.

We will always undertake to share our intention to refer a child to Social Care (First Response) with their parent/carer's consent, unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with First Response on this point. We recognise that GDPR data Protection Act 2018 must not be a barrier for sharing information regarding safeguarding concerns in line with **'Working Together'**.Gov guidance link: Information sharing advice for safeguarding practitioners

8. Recognising abuse

In the event of a child disclosing abuse staff must refer to the following guidance:

"What to do if You're Worried a Child is Being Abused"
Stat guidance template (publishing.service.gov.uk)

Listen to the child, allowing the child to tell you what has happened in their own way and at their own pace. Staff must not interrupt a child who is freely recalling significant events. Remain calm. Be reassuring and supportive, endeavouring not to respond emotionally.

Do not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the child may have said or to gain sufficient information to know that this is a safeguarding concern. Staff are trained to use TED; Tell, Explain, Describe.

Make an accurate record of what they have seen/heard using the PRU's record keeping processes, recording; times, dates or locations mentioned, using as many words and expressions used by the child, as possible. Staff must not substitute anatomically correct names for body part names used by the child.

Reassure the child that they did the right thing in telling someone.

Staff must explain to the child what will happen next and the need for the information to be shared with the DSL.

In the unlikely event the DSL and the deputy DSL are not available, staff are aware they must share their concerns with the most senior member of staff.

If there is immediate risk of harm to a child, staff will NOT DELAY and will ring 999.

The child will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how best they can be safeguarded.

Reporting systems for children:

At the PRU children are made to feel safe and secure to share any concerns that they may have and know the systems in place for making any such report. This is achieved through building trust and a safe environment for children to learn through daily routines and the PRU values.

Following a report of concerns the DSL must decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to First Response and the police if it is appropriate, referring to the guidance, When to Call The Police:

NPCC Guidance for schools and colleges

The rationale for this decision should be recorded by the DSL/ADSL.

The PRU must try to discuss any concerns about a child's welfare with parents/carers and, where possible, obtain informed consent before making a referral to First Response. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with First Response or the police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views must also be taken into account.

If there are grounds to suspect a child is suffering or is likely to suffer significant harm, the DSL (or Deputy) must contact First Response by telephone immediately, in first instance and then complete the Multi Agency Referral Form (MARF).

If the child is in immediate danger and urgent protective action is required, the police and/or ambulance must be called, via 999. The DSL/ADSL must notify First Response of the occurrence, what action has been taken and to take advice about informing parents/carers.

9. Multi-agency working

The PRU knows what the role of schools is, as a relevant agency, within the three safeguarding partner arrangements and as required, will contribute to multi-agency working, in line with the statutory guidance 'Working Together to Safeguard Children'.

When named as a relevant agency and involved in safeguarding arrangements, the PRU will co-operate alongside other agencies with the published arrangements.

The PRU will contribute to inter-agency plans to offer children support through community-based early help or targeted Family Help and those children supported through child protection plans.

The PRU will allow access for and work with children's social care to conduct or consider whether to conduct as section17 or section 47 assessment.

If, following a referral, the situation is not improving for the child, the DSL will follow the escalation process.

10. Supporting Staff

We recognise that staff becoming involved with a child who has suffered harm, or appears to be likely to suffer harm, could find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL team and to seek further support if necessary. This could be provided by the Head teacher, line manager or another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union as appropriate.

11. Safer Recruitment

The PRU follows the guidance as set out in the KCSIE together with the information provided by the Bucks Safeguarding Children Partnership to ensure that all the appropriate checks have been carried out on new staff and volunteers.

The PRU will apply the regulated-activity and Disclosure and Barring Service requirements in KCSIE 2026. The previous supervision exemption for volunteers undertaking teaching, training, instructing or supervising children has been removed. Volunteer roles will therefore be assessed individually before work begins so that the correct enhanced DBS and, where required, children's barred-list check is obtained. Where the PRU includes EYFS provision, staff or volunteers will not begin regulated activity in that provision before the required certificate and barred-list information have been received.

Safer Employment & the LADO (Allegations)

12. Allegations against staff, supply staff, volunteers and contractors (including Member of the Management Committees)

At the PRU, we have our own procedures for managing concerns and/or allegations against those working in the PRU to include staff, supply teachers, volunteers and contractors.

These procedures apply equally to staff, supply staff, trainee teachers, volunteers, contractors and members of the Management Committee. The PRU shares safeguarding responsibility with any agency, training provider or third-party employer and will involve that organisation

appropriately without allowing this to delay consultation with the LADO or action to safeguard a child.

KCSIE - Part four contains comprehensive guidance covering the two levels of allegations/concern:

1. Allegations that may meet the harms threshold
2. Allegations/concerns that do not meet the harms threshold - referred to for the purpose of this guidance as 'low level concerns'.

All PRU staff, supply staff, volunteers and contractors must take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents/carers to be conducted in view of other adults. If this is not possible, then discussions about safeguarding and assessing the risks should take place. This includes staff members who are working individually in schools as part of our outreach service, and the occasions when staff agree to transport pupils in private vehicles.

We understand that a pupil may make an allegation against a member of staff, member of supply staff, volunteer or contractor. If such an allegation is made, the member of staff notified of the allegation will immediately inform the Head teacher or another member of SLT if the Headteacher is not present. If the allegation is made against the Headteacher, inform the PRU Operations Manager who will inform the Chair of Member of the Management Committee. If the PRU Operations Manager is not available, then the staff member must contact the Chair.

At the PRU, we recognise that an allegation may be made if a member of staff, a member of supply staff, a member of the Management Committee, a volunteer or a contractor has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviours both inside and outside of school.

The Headteacher/other member of SLT/Chair of the Management Committee (where the allegation is in reference to the Headteacher) on all such occasions must immediately discuss the content of the allegation with the Local Authority Designated Officer (LADO).

The Headteacher/SLT/ Chair of the Management Committee must:

- Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member, supply staff member, member of the Management Committee, volunteer or contractor against whom the allegation is made, as well as supporting other staff, supply staff members, member of the Management Committees, volunteers and contractors within the workplace.
- Follow all advice given by the LADO relating to supporting the child making the allegation, as well as other children connected to the organisation.
- Ensure feedback is provided to the LADO about the outcome of any internal investigations.

The PRU will follow the local safeguarding procedures for managing allegations against staff, supply staff, member of the Management Committees, volunteers and contractors, a copy of which can be found in the shared drives (conduct and discipline folder). Hard copies are available on request.

If the allegation is made against a member of staff supplied by an external agency, the agency will be kept fully informed and involved in any enquiries from the LADO.

Suspension of the member of staff against whom an allegation has been made needs careful consideration and, if necessary, we will consult with the LADO in making this decision. Guidance will also be sought from HR.

Our lettings agreement for other users requires that the organiser will follow the Buckinghamshire Council procedures for managing allegations against staff and where necessary, the suspension of adults from school premises*. (Note: the PRU does not currently let its sites*).

Where premises are hired, rented or otherwise used by an outside organisation or individual, the PRU will seek assurance that appropriate safeguarding and child-protection arrangements are in place and inspect these where necessary. Safeguarding requirements and liaison arrangements will be conditions of use, applying whether participating children are on the PRU roll. Failure to comply may result in termination of the agreement.

Should an individual staff member, supply staff member, member of the Management Committee, volunteer or contractor be involved in child protection, other safeguarding procedures or Police investigations in relation to abuse or neglect, they must immediately inform the Headteacher. In these circumstances, the PRU will need to assess whether there is any potential for risk of transfer to the workplace and the individual's own work with children.

Where there are low level concerns recorded against a member of staff, these should be reviewed regularly, and if they are considered significant, the processes for allegations should be followed.

13. Whistleblowing

We have a **Whistleblowing Policy** which can be found in the shared drives and is displayed on each site. The policy is also referenced in team meetings as a reminder to all staff. Staff are required to familiarise themselves with this document during their induction period.

All staff must be aware of their duty to raise concerns about unsafe practice or the attitude or actions of colleagues and report their concerns to the Head teacher or the Chair of the Management Committee.

Low-level concerns

At the PRU, all staff must report any concern, however small, that an adult working with children may have acted inconsistently with the Staff Code of Conduct or expected professional boundaries, even where the harm threshold is not met. Low-level concerns must be reported promptly and directly to the Headteacher, or to the Chair of the Management Committee where the concern is about the Headteacher, using the agreed confidential recording process. A child's CPOMS record may contain the safeguarding impact or the child's account, but it must not be the sole record of a concern about an adult. Records will be reviewed for patterns, repetition, escalation and wider organisational learning. Conduct in an adult's personal, professional or community life may be relevant to their suitability to work with children.

14. Physical intervention/Positive handling

Our policy on physical intervention/positive handling by staff is set out separately in our Use of Force policy and follows the government guidance. Use of force at the PRU is always a last resort. All staff receive training through an approved programme aimed at de-escalation, and safe techniques for physical interventions in order to keep pupils and others safe.

Any use of reasonable force or restrictive intervention must be lawful, necessary, proportionate and the least restrictive response reasonably available. It must be recorded and reviewed in accordance with the PRU's Use of Force policy. Any allegation that a child has been harmed, or any concern about an adult's conduct during an intervention, must be considered separately

under the allegations or low-level concerns procedure and must not be treated only as a behaviour or restraint record. Significant incidents and patterns will be reviewed by senior leaders and reported or escalated as required.

Use of reasonable force in schools

15. Anti-Bullying

Bullying is referenced within the PRU's **Anti -Bullying Policy** and measures are in place to prevent and respond to all forms of bullying, which acknowledges that to allow or condone bullying may lead to consideration under child protection procedures and/or staff conduct procedures.

16. Discriminatory Incidents

In line with the **Equalities Act 2010**, our **Equalities Policy** addresses all forms of discriminatory incidents. and takes into account any local and national guidance. The PRU acknowledges the serious nature of discriminatory and the impact on pupils, including those who witness the incident. All incidents will be taken seriously and consider given to whether a multi-agency approach is needed to support those involved.

17. Health and Safety

We recognise the importance of safeguarding pupils throughout the PRU day. Our **Health and Safety policy** reflects the consideration we give to the protection of our children, both physically and emotionally, within the PRU environment.

Part of the safeguarding measures we have in place include the safe drop off and collection of pupils at the start and end of the PRU day. All parents/carers must deliver their children to the PRU reception areas and collect them from the same place. Where school transport is in place, the same drop off and pick up points apply. Parents/carers are expected to inform us by phone, in writing or by talking to a member of the PRU team if there is to be a change in the arrangement of collection for their child. The PRU will put in place appropriate identity checks/identification codes when new arrangements are agreed

The PRU site is secure. All staff are aware of "hotspots" in the PRU where pupils have expressed anxiety or where areas of potential vulnerability may exist. If a pupil raises a concern it will be dealt with on an individual basis and may involve additional support or Positive Intervention Plans. Children at the PRU are closely supervised which minimises the risks from areas of potential vulnerability such as pupils exiting the building/site without permission.

Pupils who leave the site during the school day do so only with the written permission of a parent/carer and are collected by an authorised adult where appropriate.

The PRU should be notified by the parents/carers regarding whom they have authorised for this task. The PRU staff will expect to see proof of identification as described above.

In the event of a pupil going missing during the course of the school day we will carry out immediate checks to ensure the pupil is not on site, we will then make contact with the pupil's parents/carers and inform the police.

At the PRU we ensure that we are aware of the content of materials used by any visiting speakers prior to their visit.

18. Prevent Duty

We are aware of the Prevent Duty under **Section 26 of the Counter Terrorism and Security Act 2015** to protect young people from being drawn into terrorism.

All PRU staff and members of the Management Committees have completed Prevent training and we have training logs to evidence this.

We have in place and monitor appropriate web filtering systems.

The DSLs and senior leaders are familiar with their duties under The Prevent Duty Guidance: Revised Prevent duty guidance: for England and Wales

19. Online Safety

All staff are aware of the PRU policy for **Online-Safety** which sets out our expectations relating to:

- Creating a safer online learning environment,
- Giving everyone the skills, knowledge and understanding to help children stay safe on-line, question the information they are accessing and support the development of critical thinking,
- Inspiring safe and responsible use of mobile technologies, to combat behaviours on-line which may make pupils vulnerable, including the sending of nude or semi-nude images.
- Use of camera equipment, including smart phones.
- What steps to take if there are concerns and where to go for help.
- Staff use of social media as set out in the **Staff ICT Code of Conduct**.

Cyber-bullying by children, via texts, social media and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. All staff are aware that pupils placed with the PRU are vulnerable and have a number of complex needs. Consequently, staff are alert to any changes in behaviour or the wellbeing of pupils we support. The PRU will liaise with other professionals as needed so that the most appropriate safeguarding actions can be taken to support both the victim and the bully (if a pupil at the PRU).

The PRU are aware of the risks posed by children in the online world; in particular, non-age appropriate content linked to self-harm, suicide, grooming and radicalisation.

Pupils, staff and parents/carers are supported to understand the risks posed by:

- the CONTENT accessed by pupils – risks such as misinformation, disinformation, including fake news and conspiracy theories.
- their CONDUCT on-line
- who they have CONTACT within the digital world
- COMMERCE - risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The PRU has policies and procedures to support the safe use of IT and mobile technology. The PRU staff will discuss with parents/carers and pupils as part of normal routines and during the completion of in-reach paperwork prior to the start of placements

The PRU is part of the Schools ONE Network Broadband & Web Filtering which uses Cisco Firewalls which in turn utilises a security suite called Cisco Talos (Cisco's Security Operations Centre SOC) for content filtering. By default, in line with KCSIE and Prevent Duty, the appropriate categories are blocked. These categories are dynamic and sites are added as they are scanned and updated by Cisco Talos SOC. The filtering system blocks CSAM and Cisco Talos is updated as new sites become available, blocking a range of unlawful material. Access logs are recorded on the firewall and available for interrogation if required.

In addition to these filtering systems, classroom staff monitor use of IT in the class room as part of day to day routines.

The PRU will follow the advice as given by the government, to advise and support children with any online learning taking place at home to ensure this is done so safely.

Our mobile phone policy, e-safety policy and ICT code of conduct set out the acceptable use of mobile technology by pupils on site and in school transport. This includes actions that might be taken if pupils do not follow the rules or behave in a safe way.

Visitors to our school are respectfully requested to turn all mobile devices off whilst on site and informed that mobile technology should not be used around pupils. Visitors may leave items in the PRU offices for safe keeping.

Staff use of mobile technology whilst on site is set out in the **Staff ICT Code of Conduct.**

All staff receive online awareness training in order to understand the risks children are exposed to. On induction and at least once per academic year.

All staff have an understanding of expectations roles and responsibilities with regards to the online filtering and monitoring processes.

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

Generative AI tools must be used safely, ethically and lawfully and in accordance with safeguarding, data-protection, acceptable-use and assessment requirements. Staff and pupils must not enter personal, confidential or sensitive information into an AI tool unless the tool has been formally approved for that purpose. AI-generated content must be critically checked because it may be inaccurate, biased, incomplete or harmful, and it must not replace professional judgement.

From 1 September 2026, the PRU will follow the statutory guidance on mobile phones in schools and operate as a mobile-phone-free environment throughout the school day by default. The Relational Behaviour Policy and relevant acceptable-use procedures will explain storage, confiscation, searching, sanctions and communication with parents. Decisions must remain proportionate and allow necessary reasonable adjustments or exceptional arrangements for disability, SEND, medical needs, young carers or safeguarding circumstances.

Generative AI: product safety expectations

20. Sending nude or semi-nude images

Making or sharing nudes and semi-nudes includes photographs, videos, livestreams and images that have been digitally altered or wholly generated using artificial intelligence, including deepfakes or 'deep nudes'. Every incident involving a person under 18 requires a safeguarding response, whether the image is described as consensual or non-consensual. Staff must preserve available information, avoid viewing, copying or forwarding imagery unnecessarily, report immediately to the DSL or an ADSL and follow UKCIS and local safeguarding procedures.

Further advice and guidance can be found using the link below:

Sharing nudes and semi-nudes: advice for education settings working with children and young people

Staff, pupils and parents/carers are supported, via training, to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes images of pupils themselves if they are under the age of 18.

Any disclosures/incidents that occur will follow the normal safeguarding practices and protocols for our school. We will also use the guidelines for responding to incidents, as set out in:

Sharing nudes and semi-nudes: advice for education settings working with children and young people

produced by the UK Council for Internet Safety. The DSL will inform parents/carers of any incidents.

21. Child on Child Abuse, including sexual violence and sexual harassment.

The PRU believes that all children have a right to attend school and learn in a safe environment free from harm by both adults and other pupils. We recognise that some safeguarding concerns can occur via child on child abuse.

Child-on-child abuse is preventable and may be a safeguarding concern for both the child who has experienced harm and the child displaying harmful behaviour. It can occur inside or outside the PRU and online, and may include serious physical harm, threats involving weapons, prejudice-based abuse, misogynistic or misandrist behaviour, stalking, financial exploitation and a continuum of harmful sexual behaviour through to sexual violence. The absence of reports does not mean that abuse is not occurring.

All concerns must be reported verbally to the DSL or an ADSL without delay and recorded on CPOMS under the appropriate safeguarding category. The DSL will consider immediate safety, the wishes and needs of the children, SEND and communication needs, the risk to others, parental involvement, internal support, Family Help, children's social care, LADO consultation where relevant and police involvement. Staff must not dismiss abusive behaviour as banter, part of growing up or an inevitable feature of a PRU setting.

All staff operate a zero-tolerance policy to child on child abuse and will not pass off incidents as ‘banter’ or ‘just growing up’.

All staff recognise that child on child issues may include, but may not be limited to:

- Bullying (including cyber bullying)
- Racial abuse
- Physical abuse, such as hitting, hair-pulling, shaking, biting or other forms of physical harm
- Sexual violence and sexual harassment
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party (Harmful sexual behaviour HSB)
- Abuse related to sexual orientation or identity
- Sending nude or semi-nude images (consensual & non-consensual)
- Upskirting and initiation/hazing type violence and rituals
- Emotional abuse
- Abuse within intimate partner relationships

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. Incidents of child on child abuse must be reported to the DSL, who will refer to the appropriate agencies as required.

The following will be considered when dealing with incidents:

- Whether there is a large difference in power between the victim and perpetrator i.e. size, age, ability, perceived social status or vulnerabilities, including SEND, CP/CIN or CLA
- Whether the perpetrator has previously tried to harm or intimidate pupils

- Any concerns about the intentions of the alleged perpetrator
- How to best support and protect the victim and alleged perpetrator as well as any other children who may have been involved or impacted.
- Risk assessments and safety planning will be created in conjunction with external professionals.

In order to minimise the risk of child on child abuse taking place, The PRU (as a school) must:

- Deliver RE/RSE/PSHE to include teaching pupils about how to keep safe and understanding what acceptable behaviour looks like
- Ensure that pupils know that all members of staff will listen to them if they have concerns and will act upon them
- Have systems in place for any pupil to be able to voice concerns
- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti-Bullying Policy.**

We recognise that 'Upskirting' involves taking a photograph under an individual's clothing without their knowledge. We understand that it causes the victim distress and humiliation and that any gender can be a victim. Staff recognise that 'Upskirting' is a criminal offence and must promptly report any such incidents to the Head teacher, SLT, DSL team or most senior member of staff.

Reference will be made to the following government guidance and part 5 of **the Keeping Children Safe in Education** to ensure that all staff have an understanding of the serious nature of sexual violence and sexual harassment between children in schools. The PRU ensure that they keep up with current legislation and practice referring to trusted advisors such as BSCP, NSPCC and Ofsted guidance.

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. This can occur online, face to face (both physically and verbally) and can take place inside or outside of school. As set out in Part five of the KCSIE, all staff maintain an attitude of **'it could happen here'** and it is never acceptable.

All staff have a responsibility to address inappropriate behaviour in a timely manner, however seemingly insignificant it may appear.

All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. No child will ever be made to feel ashamed for making a report or that they are creating a problem for our school.

Support will be given to both victims and perpetrators as required.

22. Cultural Issues

At the PRU we are aware of the cultural diversity of the community around us and work sensitively to address the unique culture of our pupils and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse arising from culture, ethnicity, faith and belief on the part of their parent, carer or wider community.

Staff must report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

23. So-Called 'Honour' Based Abuse

Staff at the PRU understand there is a legal duty to report known cases of Female Genital Mutilation (FGM) and So Called 'Honour' Based Abuse to the police and they will do this with

the support of the DSL. Mandatory reporting of female genital mutilation: procedural information

The PRU is aware of the need to respond to concerns relating to forced marriage and understand that it is illegal, a form of child abuse and a breach of children's rights. We recognise some pupils, due to capacity or additional learning needs, may not be able to give an informed consent and this will be dealt with under our child protection processes. PRU staff can contact the Forced Marriage Unit if they need advice or information. Contact 020 7008 0151 fmu@fcdo.gov.uk

We are aware of the signs of FGM Female genital mutilation (FGM) | NSPCC

We recognise both male and female pupils may be subject to honour-based abuse.

We promote awareness through training and access to resources, ensuring that the signs and indicators are known and recognised by staff.

Any suspicions or concerns for forced marriage are reported to the DSL who will refer to First Response or the police if emergency action is required.

24. Contextual Safeguarding and extra-familial harms

Contextual Safeguarding is an approach to understanding and responding to children's experiences of significant harm beyond their families. Extra-familial harm is linked to contextual safeguarding; these concepts refer to harms that occur outside of the family system, including harmful online contact.

At the PRU, all staff recognise that pupils may encounter safeguarding incidents that happen outside of school and can occur between children outside of this environment. We will respond to such concerns, reporting to the appropriate agencies in order to support and protect the pupil.

All staff and especially the DSLs, will consider the context of incidents that occur outside of school to establish if situations outside of their families may be putting the pupil's welfare and safety at risk of abuse or exploitation, including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Children who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare.

In such cases the individual needs and vulnerabilities of each child will be considered.

Further guidance can be found at: https://contextualsafeguarding.org.uk/

25. Serious Violence

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

At the PRU we are aware of the range risk factors which increase the likelihood of involvement in serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery. We will take appropriate measures to manage any situations arising. Preventing youth violence and gang involvement - Practical advice for schools and colleges

26. Domestic Abuse

All staff recognise that children who experience domestic abuse, including intimate partner abuse, referred to as 'teenage relationship abuse' KCSIE, can suffer long lasting emotional and psychological effects. Staff also recognise the impact on children seeing, hearing or experiencing the effects of domestic abuse. Staff must report any concerns using the PRU's safeguarding procedures.

27. Children who need a social worker (Child Protection and Child In Need Plans)

Staff recognise that children may have a social worker due to safeguarding or welfare needs and this can cause them to have barriers with attendance, behaviour, learning and mental health. The PRU will share information with a social worker for any child whom they are supporting to ensure decisions are made in the best interests of the child. Informed decisions, will be made by staff with regards to safeguarding for those children who are being supported by a social worker.

The Virtual School lead the support for this cohort of children and the PRU will work in partnership with them and the Local Authority to improve outcomes for these children.

28. Mental Health

At the PRU we are aware that mental health problems can be an indicator that a child has suffered or may be at risk of suffering abuse, neglect, or exploitation.

The PRU will maintain clear routes for identifying, recording and escalating mental-health concerns, including accountability for referrals and follow-up. Where a mental-health concern is also a safeguarding concern, staff must report it to the DSL or an ADSL without delay. For urgent mental-health help staff will use the appropriate emergency route, including NHS 111 and its mental-health option where suitable, or 999 where there is immediate danger.

Staff recognise that traumatic adverse childhood experiences can have lasting impact throughout a child's life and this can impact on mental health, behaviour and education.

Staff will report any mental health concern that is linked to a safeguarding concern to the DSL.

Where there are concerns for a child's mental health the PRU will seek advice from a trained professional, who would be able to make a diagnosis of a mental health problem. The mental health lead at the PRU is Anne Marie Jacob. Mental health and behaviour in schools

29. Looked After Children

The PRU has a named Designated Teacher (DT), who is responsible for promoting the education achievement and well-being for LAC and previously LAC children. At the PRU, our DT is Jay Hawes.

The DT works closely with the ADSLs to ensure that any safeguarding concerns are responded to quickly and effectively and are shared with the appropriate agencies.

For a looked-after child, the designated teacher will ensure that appropriate staff understand the child's legal status, contact arrangements, care arrangements and the level of authority delegated to the carer. The DSL will hold current details for the child's social worker and Virtual School Head. The expanded Virtual School Head role, including support relating to attendance and children in kinship care, will be reflected in planning and liaison where relevant.

The Virtual School, who is responsible for overseeing the progress of this group of children, work in partnership with the DT and other agencies, supporting them to promote better outcomes for these children.

30.Children with family members in prison

Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The PRU will access support for any affected children through The National Information Centre on Children of Offenders (NICCO) who can provide information designed to support professionals working with offenders and their children.

NICCO

31. Homelessness

The PRU recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and that some 16 and 17 year olds could be living independently from their parents or guardians. If there are indicators that a family or individual are at risk, school will seek timely support from the local authority.

32. Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If school are concerned that a child is being affected by modern slavery they will refer to the home office guidance for further information on the indicators that someone may be a victim, what support is available to victims and how to refer them to the NRM, whilst also seeking support from the local authority.

Modern slavery: how to identify and support victims

33. Allegations against pupils

If an allegation is made against a pupil, the PRU will follow the procedures in the Behaviour Policy with regards to sanctions that may need to be applied.

Where there is a risk of significant harm, a child-on-child referral will be made to Children's Services for either victim, perpetrator or both.

If it is necessary for a child to be interviewed by the police, or other authorities, school will ensure that parents/carers are informed as soon as possible, following advice from external agencies and that the child is supported by an appropriate adult during the interview. The safety and welfare of the child will always be carefully considered by school.

Signed by: Date:

Chair, Management Committee

Signed by: Date:

Headteacher

Appendix

Everyone who works with children has a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a child or if a child discloses to them.

The following is intended as a reference for school staff and parents/carers if they become concerned that a child is suffering or likely to suffer significant harm.

The Children Act 1989 defines abuse as when a child is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development. Four categories of abuse are identified:

Categories of Abuse

Child abuse is a form of maltreatment. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

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

Emotional Abuse
The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse
Involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

a) provide adequate food, clothing and shelter (including exclusion from home or abandonment)
b) protect a child from physical and emotional harm or danger
c) ensure adequate supervision (including the use of inadequate caregivers)
d) ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation

Exploitation is a form of child abuse and may take a number of forms:

Child Sexual Exploitation (CSE) and child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
Taken from – **Keeping Children Safe in Education.**

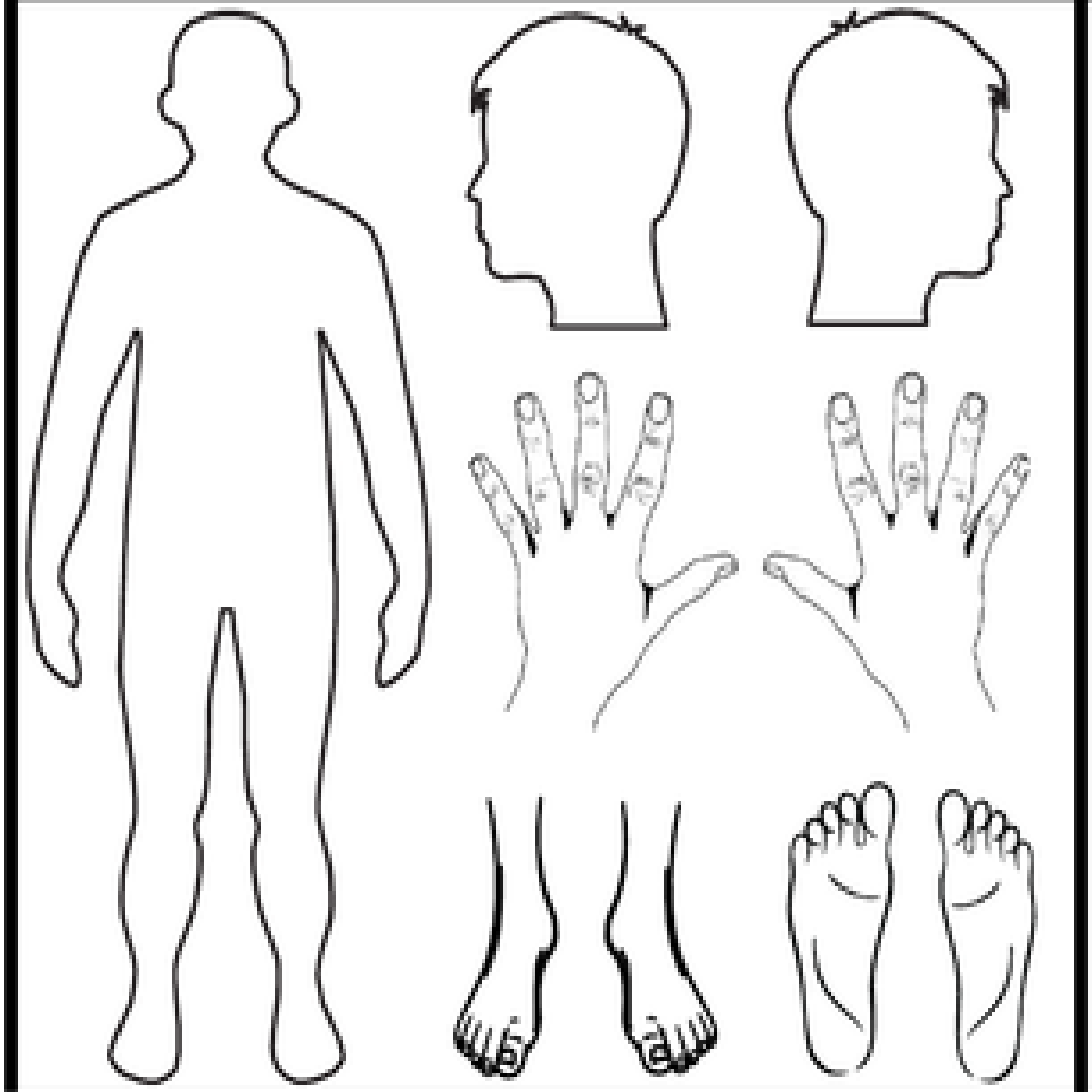
Home Office – Serious Violence Strategy, April 2018

County Lines
County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Taken from **"Keeping Children Safe in Education"**

Extremism
Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Harmful sexual behaviour (HSB)
Children's sexual behaviour ranges, from normal and developmental expected to inappropriate, problematic, abusive and violent. The inappropriate, problematic, abusive and violent behaviour can cause developmental damage and is referred to as "Harmful Sexual Behaviour" (HSB).

CHILD PROTECTION BODY MAP



Name of child:

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Date of birth:

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Staff member raising concern:

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Date recorded:

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Observations:

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